

December 22, 2015

**COMMENTS ON BEHALF OF THE CITIES OF
ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE LOCAL MARKET POWER
MITIGATION ENHANCEMENTS STRAW PROPOSAL**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the ISO's November 25, 2015 Local Market Power Mitigation Enhancements Straw Proposal (the "Straw Proposal").

The Six Cities support the ISO's proposed enhancements to the market power mitigation process to address under- and over-mitigation in the 15-minute RTPD market and the modifications to the 5-minute RTD market and believe that they adequately address concerns regarding the accuracy of the LMPM run in predicting congestion on constraints in the RTPD and RTD market runs. Specifically, performing the LMPM run as part of the binding interval RTPD run, as described by the ISO on page 8 of the Straw Proposal, is a good option for reducing RTPD under-mitigation. Likewise, the Six Cities support the ISO's proposed enhancement to RTD mitigation to create a market power mitigation process within the RTD runs. *See* Straw Proposal at 8-9.

Submitted by,

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