

February 12, 2016

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,  
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA  
ON THE DRAFT FINAL PROPOSAL ON REVISED SETTLEMENT STATEMENTS  
AND DISPUTE TIMELINE FOR T+35M**

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 January 21, 2016 Revised Settlement Statements and Dispute Timeline for T+35M Draft Final Proposal (the "Draft Final Proposal").

The Six Cities support the ISO's proposal to change the publication date for the T+35M settlement statement to T+33M with a 22 business day dispute timeline. This change will provide parties a more reasonable amount of time to review settlement statements, identify errors, and submit disputes. This timeline is also consistent with the dispute timelines in the earlier portions of the cycle.

Further, the Six Cities believe that, as a general matter, the benefits of this change likely outweigh the costs to implement the change. Because the proposal would not modify the settlements process, but rather just change the timing of the final settlement statement, it is not obvious why this change would require a major expenditure. While there will be some measure of costs incurred to make changes to the ISO's system to advance the publication date for the T+35M settlement statement, by allowing additional time to review settlement statements, identify errors, and submit disputes, market participants may avoid the situation where it is too late to resolve an error that results in a substantial loss to the market participant. Allowing adequate time to review the final set of settlement statements and resolve errors will promote market outcomes consistent with the Tariff, and there is no evidence that implementation costs to advance the publication of final settlement statements will be so great as to outweigh the value of accurate settlements and fairness to market participants.

Submitted by,

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