

January 6, 2016

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE STRAW 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 December 7, 2015 Revised Settlement Statements and Dispute Timeline for T+35M Straw Proposal (the "Straw Proposal").

In response to the August 24, 2015 Complaint filed by Shell Energy, North America (US), L.P. ("Shell Energy") against the ISO, the Six Cities submitted comments supporting Shell Energy's contention that the current T+35M Dispute Deadline is unjust and unreasonable and should be revised. As described in those comments, the Six Cities do not believe that the current five business day deadline provides an adequate opportunity to identify errors that may appear for the first time in Recalculation Settlement Statement T+35M.

Therefore, the Six Cities appreciate the ISO's implementation of a stakeholder initiative to address the settlement statements timeline and the T+35M dispute deadline, and the Cities support the ISO's proposal. Changing the publication date for the T+35M settlement statement to T+33M with a 22 business day dispute timeline 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.

Submitted by,

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