

**Stakeholder Comments Template**

**System Market Power Mitigation**

This template has been created for submission of stakeholder comments on the Draft Final Proposal for the System Market Power Mitigation initiative*.* The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](http://www.caiso.com/StakeholderProcesses/System-Market-Power-Mitigation).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business **July 14, 2020.**

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| **Submitted by** | **Organization** | **Date Submitted** |
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**Please provide your organization’s general comments on the following issues and answers to specific requests.**

1. **Pivotal Supplier Test Trigger**

Please provide your organization’s specific feedback on the ISO’s Pivotal Supplier Test Trigger proposal, as described within the draft final proposal, which includes several criteria to only perform the three pivotal supplier test when there is a potential for system-level market power.

1. **Pivotal Supplier Test Design**

Please provide your organization’s specific feedback on the ISO’s proposal to use the three pivotal supplier test to determine if pivotal suppliers in the ISO Balancing Authority Area (BAA) could exercise market power in the constrained region, as described within the draft final proposal.

1. **Determining competitive LMP**

Please provide your organization’s feedback on the proposal to calculate the competitive locational marginal price (LMP) when the ISO BAA fails the system-level market power mitigation test.

1. **Applying mitigation to internal supply offers**

Please provide your organization’s feedback on the proposal to apply the Pivotal Supplier Test to mitigate pivotal supplier resource offers within the ISO’s BAA when the pivotal supplier test fails.

1. **Additional comments**

Please offer any other feedback your organization would like to provide on the revised straw proposal and topics discussed during the web meeting.