

**COMMENTS OF IDAHO POWER COMPANY
ON CAISO'S MARKET SETTLEMENT TIMELINE DRAFT FINAL PROPOSAL**

Submitted By	Company	Date Submitted
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Idaho Power Company (“Idaho Power”) appreciates the opportunity to comment on the California Independent System Operator’s (“CAISO”) Market Settlement Timeline Draft Final Proposal (“Draft Final Proposal”), dated September 20, 2019. Idaho Power fully supports the Draft Final Proposal and thanks CAISO for its work in developing and refining it. Idaho Power comments on certain aspects of the proposal below.

I. Implementation

Idaho Power supports an implementation date of Fall 2020 and has discussed this timeline with our vendor, who indicated that there is ample time for system modifications to be made before the Fall release in 2020 as long as CAISO does not change the format of how they publish the settlement statements. In addition, Idaho Power feels this timeline is sufficient for any additional internal business processes to be implemented.

II. Proposal to re-align, consolidate, and extend the required settlement timeline within 70 business days after a trade date

Idaho Power fully supports the CAISO’s Draft Final Proposal to re-align, consolidate, and extend the required settlement timeline to publish two settlement statements within 70 business days after a trade date (T+9B and T+70B). Removing the current T+3B initial statement, which does not include settlement quality meter data or price correction data and is not disputable, and instead issuing the initial statement at

T+9B, gives CAISO the ability to include meter and price correction data in the initial settlement statements which improves the accuracy of the initial statement. This also will decrease the workload for those spending time reviewing the lower quality T+3B statement. Replacing the T+12B and T+55B required recalculation statements and replacing them with one statement at T+70B will provide additional time for CAISO to address and resolve complex disputes submitted by market participants so that changes can be incorporated in the T+70B required statements. This should reduce the frequency of CAISO needing to publish optional settlement statements since they now have an additional 10 business days to resolve these disputes.

III. Proposal to re-align and shorten the optional settlement timeline beyond 70 business days after a trade date

Idaho Power also supports CAISO's proposal for optional settlement statements at T+11M, T+21M, and T+24M, and to reduce the normal settlement statement life cycle from 36 months to 24 months. It is our understanding that the extended recalculation T+70B statement is going to include most dispute corrections aside from system issues. Based on the information discussed in the Market Settlement Timeline Stakeholder Conference Call on September 30, 2019, it is our understanding that there are times where system issues cannot be addressed until a quarterly release. The T+11M timeframe gives CAISO ample time to resolve those system issues and incorporate those by the T+11M optional statement. Based on this discussion by stakeholders and CAISO, Idaho Power supports the optional timelines as proposed, as they will also decrease record retention requirements, save internal database storage, and decrease workload on settlements staff.

Idaho Power thanks CAISO for the opportunity to comment and for its work on this initiative and looks forward to continued collaboration.