

**PUGET SOUND ENERGY COMMENTS**  
**MARKET SETTLEMENT TIMELINE REVISED STRAW PROPOSAL**  
**SEPTEMBER 6, 2019**

Puget Sound Energy (PSE) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Market Settlement Timeline Revised Straw Proposal (Proposal) dated August 15, 2019. PSE believes that most of the revisions to the proposal sufficiently address the concerns that were raised by stakeholders. As such, PSE is pleased to support the Proposal with the exception of the \$100 threshold on settlement disputes, as discussed further below.

In Section 6.3.3 of the Proposal, CAISO proposes to impose a \$100 threshold on disputed revenues or charges. CAISO reasons that the threshold will allow market participants to focus on disputes of higher value to the market, regardless of whether the dispute is valid. PSE appreciates the additional information that CAISO included in the Proposal on this issue, and agrees that this limitation will decrease the administrative burden associated with low-value settlement re-calculations. However, PSE believes that imposing the threshold is inherently unfair because it will summarily dismiss valid claims. PSE does not agree that the efficiency gained through imposing the threshold should come at the cost of settlement of a valid dispute, regardless of its magnitude. Accordingly, PSE urges CAISO to remove the dispute threshold portion of the proposal.