



Stakeholder Comments Template

Market Settlements Timeline

This template has been created for submission of stakeholder comments on the Revised Straw Proposal meeting that was held on August 22, 2019. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business **September 6, 2019**.

Submitted by	Organization	Date Submitted
<i>Matthew Richardson</i>	<i>SDG&E</i>	<i>9/6/19</i>

Please provide your organization's comments on the following issues and questions.

1. Modify settlements timeline

Please provide your organization's feedback on modifying the settlements timeline, as described in the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

SDG&E likes the general direction of this initiative and is glad to see CAISO's consideration of stakeholder comments in the revised proposal. SDG&E does have concerns and comments around the changes CAISO is proposing for dispute processing.

First, we would like to echo the comments of the other utility market participants, PG&E and SCE, that principal disputes are important. We agree with CAISO's sentiment of wanting to minimize unnecessary administrative burden and that participants shouldn't abuse their ability to dispute anything for any amount. Because all disputes do not have a dollar impact, SDG&E would like CAISO to clarify how it will address issues concerning complex charge codes (like Bid Cost Recovery) and how it will be addressed in CAISO's tariff. As CAISO stated the Customer Inquiry, Dispute & Information (CIDI) inquiry route will always exist, but SDG&E would caution CAISO to be prepared in changing the settlement dispute process there may likely be an influx of CIDI *inquiries* in lieu of the ability to enter into small settlement *disputes*.

Secondly, SDG&E would like some qualification and clarification around the idea of a dispute amount or threshold, especially when it comes to complex charge codes with significant pre calculations like the commitment costs surrounding Bid Cost Recovery (BCR). As an example, SDG&E might want to dispute not receiving a \$50,000 Start Up Cost for a base load unit which might not have an overall impact on the BCR charge code(s) if revenue was enough to make the unit “in the money” (meaning revenue covered all cost plus an additional \$50,000). It would be in SDG&E’s interest to still dispute especially if we see a trend, even if the overall impact for the given day is \$0 at the charge code level. Would the new proposal disallow this type of dispute and would SDG&E have to enter in an inquiry instead?

2. Extend flexibility in publishing settlements/weekly invoices

Please provide your organization’s feedback on the proposal to extend flexibility in publishing settlements/weekly invoices, as described within the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

3. Reduce administrative costs for low value disputes

Please provide your organization’s feedback on the proposal for reducing administrative costs for low value disputes, as described within the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

Additional comments

Please offer any other feedback your organization would like to provide on the Revised Straw Proposal.