



## 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](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **September 6, 2019**.

Submitted by	Organization	Date Submitted
<i>Bonnie Blair</i> 202-585-6905  <i>Meg McNaul</i> 202-585-6940	<i>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the "Six Cities")</i>	<i>September 6, 2019</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.

Six Cities' Comments: The Six Cities support the CAISO's proposed revisions to the settlements timeline as described in the Revised Straw Proposal.

#### 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.

Six Cities' Comments: The Six Cities support the CAISO's proposed clarifications to tariff provisions allowing flexibility in publishing settlement statements and weekly invoices as described at page 16 of the Revised Straw Proposal.

### 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.

Six Cities' Comments: The Six Cities support with caveats the CAISO's proposal to implement a \$100 minimum threshold for one-time, stand-alone disputes. However, the Cities are concerned that the CAISO has not provided sufficient assurance that market participants may submit, and the CAISO will address and not automatically reject, disputes that involve continuing or recurring errors that have an impact less than \$100 for an individual trade day but continue and/or recur and may cumulatively exceed that threshold. If the CAISO adopts a \$100 threshold for disputes, it should remain especially alert to the potential for recurring errors and investigate disputes for which there is any indication of continuing or recurring incidence. The Six Cities' support for the \$100 threshold is conditioned upon clarity in the proposed tariff language regarding the CAISO's commitment to investigate and resolve errors that are or may appear to be continuing or recurring in nature.

#### Additional comments

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

Six Cities' Response: The Six Cities have no additional comments at this time.