



Stakeholder Comments Template

Price Performance Analysis

This template has been created for submission of stakeholder comments on the Price Performance Analysis white paper that was published on April 3, 2019. The paper, Stakeholder meeting presentation, and other information related to this initiative may be found on the Miscellaneous Stakeholder Meetings webpage at:

<http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business April 18.

Submitted by	Organization	Date Submitted
Bonnie Blair 202-585-6905	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California ("Six Cities")	April 18, 2019

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

1. Scope

The Price Performance Analysis effort is intended to ensure ISO markets produce prices that incentivize performance and reflect system conditions. Please provide your organization's feedback on the scope of this effort. Specifically, what should be included, and what should be excluded. Please explain your rationale and include examples, if applicable.

Six Cities' Comments: The Six Cities suggest that the following evaluations be added to the scope of the Price Performance Analysis:

- 1) Evaluation/analysis of whether price divergence between CAISO markets is (a) more or less frequent, (b) greater or lesser in magnitude, and/or (c) similar or dissimilar in temporal patterns (*i.e.*, in relation to daily load shape or seasonal conditions) as compared with price divergence experienced by other ISOs/RTOs. This analysis should provide useful information on the extent to which the degree and patterns of price divergence between the CAISO markets

are similar to or different from price divergence as experienced in other ISO/RTO markets.

- 2) Evaluation/analysis of whether price divergence between CAISO markets in 2018 was (a) more or less frequent, (b) greater or lesser in magnitude, and/or (c) similar or dissimilar in temporal patterns (*i.e.*, in relation to daily load shape or seasonal conditions) as compared with price divergence experienced by the CAISO during periods prior to the initiation of the Energy Imbalance Market (“EIM”) and during the early stages of the EIM. This analysis should help to inform the extent to which the evolution of the EIM has contributed to price divergence between the CAISO’s markets.

2. Drivers

The Price Performance Analysis initiative white paper examined the potential drivers to be included within the analysis. Please provide additional drivers to consider, if any. Please explain your rationale and include examples, if applicable.

Six Cities’ Response: The Six Cities have no suggestions at this time for potential additional drivers of inter-market price divergence.

3. Data Requests

Please provide your organization’s feedback on any specific data requests. Please explain your rationale and include examples, if applicable.

Six Cities’ Response: Please see the analyses recommended in the Cities’ Comments in response to Item 1 above.

Additional comments

Please offer any other feedback your organization would like to provide on the Price Performance Analysis white paper.

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