

# Comments of Seattle City Light on CAISO Market Settlement Timeline Issue Paper and Revised Straw Proposal

Submitted by	Company	Date Submitted
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Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 450,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates hydroelectric resources with approximately 2,000 MW of flexible, fast-ramping capacity. We regularly transact in the bilateral wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Western Energy Imbalance Market (EIM) in April 2020.

Seattle thanks CAISO for the opportunity to provide comments on its Market Settlement Timeline Initiative Revised Straw Proposal. CAISO's revised straw proposal makes a number of modifications that are responsive to Seattle City Light and other stakeholder concerns.

Specifically, Seattle appreciates CAISO revising the timeline for meter data submissions from T+4 to T+7 and modifying the initial settlement statement to T+9 following the meter data submission. We believe this change will improve the quality of meter data submitted and increase the initial settlement statement quality. However, we recognize the concerns raised by some stakeholders that extending the initial settlement statement timeline could increase estimated aggregate liability and these concerns should be fully evaluated. CAISO has committed to providing further information and analysis on this issue and any final decisions on timelines should take into account this further analysis.

Seattle also supports CAISO's revised proposal to extend the dispute period to 22 days for the initial settlement statement as requested by a number of stakeholders. We agree that extending the dispute period will provide the necessary time to review settlement charges based upon actual meter data and price corrections.

Seattle also appreciates CAISO providing clarity on how it defines placeholder disputes and the additional data that indicates .02% of all dispute dollars are for non-placeholder disputes. However, despite stakeholder requests, CAISO did not provide an aggregate total dollar

amount related to these disputes by entity which would provide a deeper understanding of impact on individual entities. As a result, Seattle does not have an ability to estimate what the impact of setting up a threshold for disputes would have on our operations and liability. CAISO also did not address stakeholder concerns related to requirements to resolve all disputes with their third parties. At this time, Seattle does not believe CAISO has justified its proposal to include a minimum threshold for dispute processing and the downsides/concerns raised by stakeholders outweigh the possible benefits of decreased costs associated with eliminating some processing associated with low-dollar value disputes.

If you have any questions, please contact Lea Fisher at 206-386-4546 or [Lea.Fisher@seattle.gov](mailto:Lea.Fisher@seattle.gov).