

April 30, 2019

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA ON DRAFT TARIFF
LANGUAGE FOR LOCAL MARKET POWER MITIGATION ENHANCEMENTS**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the draft tariff language for Local Market Power Mitigation Enhancements posted by the ISO on April 16, 2019:

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| Section 29.39(e)(1) | In the second line, the phrase "from above" is confusing. "From above" what? Is there a reference missing? |
| Section 39.7.1.7.2.1(a) | The basis for the last sentence of the sub-section is not clear. Please explain the reason for the proposed requirement that the full quantity of transmission rights must be used to deliver incremental sales from the hydro resource. |
| Section 39.7.1.2.2(a) | As included in the draft, the subsection number appears to be out of sequence. It appears the sub-section number should be 39.7.1.7.2.2(a).

In the third line, insert "a" after "during". |
| Section 39.7.1.7.3 | In sub-sections (a) through (d), use of the phrase "in the" is confusing; the Six Cities suggest deleting "in the" from all sub-sections. |

Submitted by,
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