

June 27, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE
MARKET SETTLEMENT TIMELINE ISSUE PAPER AND STRAW PROPOSAL**

In response to the CAISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide their comments on the June 11, 2019 Market Settlement Timeline Issue Paper and Straw Proposal (the "Straw Proposal"):

On a preliminary basis, and subject to consideration of any concerns raised by other stakeholders, the Six Cities support the modifications to the settlements timeline recommended in the Straw Proposal. However, the Six Cities request that the CAISO confirm that it intends that the current tariff provisions allowing unscheduled recalculation settlement statements when directed by the CAISO Board or the Federal Energy Regulatory Commission will remain in effect.

The Six Cities do not oppose implementation of a \$100 minimum threshold for one-time disputes. However, the tariff language to implement the proposed minimum threshold should make clear 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 cumulatively exceed that threshold.

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