UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System Operator Corporation	**)** **)**	**Docket No. ER26-3104-000**

ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO JOINT COMMENTS

The California Independent System Operator Corporation ("CAISO") submits this answer to the joint comments filed in this docket on July 28, 2026 by the Balancing Authority of Northern California, NV Energy, PacifiCorp, and Portland General Electric (Joint Commentors).

I. Background

On July 7, 2026, the CAISO filed a petition for limited waiver to suspend the normal deadline for scheduling coordinators to dispute recalculation settlement statements issued 70 business days after the trading day (T+70B) for trading days in May 2026 and June 2026. Instead of the standard deadline of 92 business days after the trading day, the CAISO requested that all T+70B recalculation settlement statements for May 2026 and June 2026 have a single dispute deadline of December 24, 2026. Although not stated directly in the waiver, the CAISO requests an order before September 11, 2026. An order by this date will give market participants clarity regarding the dispute deadline for the first trading days of the period covered by the requested waiver.

The Joint Commentors support the CAISO's request but believe additional relief beyond what the CAISO requested may be necessary. Based on these concerns, they request the Commission direct the CAISO to file a report with the Commission "within 60 days of any Order granting the Petition to provide system status updates and explain whether additional extension of settlement dispute timelines is warranted and, if not, how the concerns identified in the Petition have been resolved."[1]

II. Comments

The CAISO's goal in seeking this waiver was to provide a one-time extension of the dispute deadline. Based on pre-filing discussions with market participants, the CAISO determined that extending the T+70B dispute deadline through December 24 for May and June trade dates would provide sufficient time for market participants to review and dispute their market settlements arising from the first two months of the Extended Day-Ahead Market and Day-Ahead Market Enhancements. At the same time, the CAISO confirms that if circumstances arise that warrant additional relief, then the CAISO will seek such relief as appropriate.

To address the Joint Commentors' concerns, the CAISO commits to engage directly and transparently with market participants throughout the waiver period and maintain ongoing dialogue to assess their readiness and evaluate whether the requested extension provides sufficient relief. This engagement will occur through the CAISO's Settlements User Group and other stakeholder forums, providing reasonable notice regarding any actions the CAISO may determine, with stakeholder input, are necessary after December 24.

In addition, the CAISO commits to publicly posting a status report no later than September 30, 2026. The report will summarize the status of settlement processing

[1] Joint Commentors, at 1.

activities and the information available at that time regarding market participants' ability to review and validate settlement results. The report also will provide the CAISO's then-current assessment regarding whether any additional actions appear necessary and identify any known risks, remaining uncertainties, and anticipated next steps.

With these commitments in mind, the CAISO respectfully submits that a Commission-directed informational filing is unnecessary. The CAISO's commitment to provide a publicly available status report will ensure transparency regarding the matters raised by the Joint Commentors while making that information available to all market participants and interested persons. Accordingly, the CAISO does not believe it is necessary for the Commission to require the informational report proposed by the Joint Commentors as a condition of the requested waiver. Moreover, any future request for additional relief, should such relief be necessary, would be addressed through a separate filing and Commission action. The September 30 status report will provide transparency regarding settlement processing, stakeholder readiness, and any known issues while allowing the CAISO and stakeholders to assess future circumstances based on the information available at that time.

III. Conclusion

The CAISO appreciates the trust market participants place in it to ensure correct market settlements and provide a fair opportunity to review and validate settlement results. The CAISO filed its July 7 waiver request with that responsibility in mind and remains committed to maintaining market participants' confidence in the integrity of the settlements process. If, through continued engagement with stakeholders, the CAISO determines that additional relief beyond December 24 is necessary to preserve that confidence and provide participants with a reasonable opportunity to validate their settlements, the CAISO will not hesitate to seek this relief.

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Dated: August 4, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 4th day of August 2026.

/s/ Ariana Rebancos

Ariana Rebancos