

Citigroup appreciates the opportunity to comment on the Price Inconsistency Caused by Inertie Constraints proposal and looks forward to arriving at a market based solution that is feasible and conducive to promoting a reliable, robust and competitive market.

### **Comments**

Citigroup would like to preserve the intention of convergence bidding and therefore has concluded that option “B” is the only proposed solution that allows for consistency in pricing for financial and physical transactions.

Whereas we feel that BCR could be a valid solution to the existing problem, until a longer term solution could be implemented, we recognize that the CAISO desires to only allow resources to participate in BCR.

Lastly, Citigroup supports the comments made by WPTF on this topic.