

Stakeholder Comments

Revised Settlement Statement and Dispute Timeline for T+35M Straw Proposal

Submitted by	Company	Date Submitted
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The following are Southern California Edison's (SCE) comments on the California Independent System Operator's (CAISO) December 7, 2015, Straw Proposal¹.

In response to market participants filing at FERC (Docket No. EL 15-94) that the T+35M Recalculation Settlement Statements dispute timeline is too short (T+5B), the CAISO has proposed two changes:

1. Change the settlements cycle for the second-to-last statement from T+35M to T+33M.
2. Set the dispute timeline for T+33M to be 22 Business Days to be in sync with other Recalculation Settlement Statements.

SCE supports the change as proposed by the CAISO. Noting that this proposed change will reduce the time available for dispute resolution by two months, SCE recommends that the CAISO consider granting an up to two month time extension for settlements impacted by Good Faith Negotiations or arbitrations from earlier disputes, as necessary.

¹ http://www.caiso.com/Documents/StrawProposal_RevisedSettlementStatementsDisputeTimelineforT_35M.pdf