

September 27, 2017

**COMMENTS ON BEHALF OF
THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE
CONSOLIDATED EIM INITIATIVES DRAFT FINAL PROPOSAL**

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 September 5, 2017 Draft Final Proposal for the Consolidated Energy Imbalance Market ("EIM") Initiatives stakeholder proceeding (the "Draft Final Proposal"):

The Six Cities support the ISO's determination to remove from the scope of this initiative the topics relating to management of bilateral schedule changes and sharing of wheeling benefits. The Cities agree with the ISO's conclusion that further consideration of these topics at this time is unnecessary.

The Six Cities take no position at this time on the ISO's recommendations for new EIM functionalities described in Section 5 of the Draft Final Proposal. The Cities understand that some stakeholders have raised concerns with respect to the proposed new functionalities, but those concerns have not been explained in detail in any public forum. Pending an opportunity to obtain a better understanding of concerns identified by other stakeholders, the Cities are unable to express a substantive position on the proposed functionalities at this time.

Submitted by,

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