

## Six Cities' Comments

### Metering Rules Enhancements (“MRE”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Metering Rules Enhancements (MRE) stakeholder initiative Draft Final Proposal Second Supplement posted on September 1, 2016.

Submit comments to [InitiativeComments@caiso.com](mailto:InitiativeComments@caiso.com)

**[Comments are due September 19, 2016 by 5:00pm](#)**

Please note: The September 1 second supplement works in conjunction with the June 7 draft final proposal and the June 16 supplement. Together all three papers represent the ISO’s MRE proposal.

All documents for the MRE initiative are available on the initiative webpage at <http://www.caiso.com/informed/Pages/StakeholderProcesses/MeteringRulesEnhancements.aspx>

Please indicate your organization’s overall level of support for the CAISO’s MRE proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Also, please provide an explanation of your organization’s position. For example, if you choose (1), then please provide reasons for your support. If you choose (2), then please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3), then please explain why you oppose the proposal.

**The Six Cities do not oppose the modification proposed by the CAISO in the Second Supplement to the Draft Final Proposal – namely, to revise the Draft Final Proposal to remove**

**the proposal to make permanent certain exemptions from the requirement to submit Settlement Quality Meter Data in five-minute intervals. The Six Cities understand that the two currently-effective “class” exemptions from this requirement will be discontinued over a two-year transition period, and that new entities will be required to comply with the requirement to submit five-minute interval data immediately, absent a showing that they are unable to do so, in which case the CAISO may exercise discretion to permit additional time for such entities to comply with the five-minute requirement.**

**During the September 12<sup>th</sup> stakeholder meeting, the CAISO advised that the requirement to submit five-minute interval data would not apply to Settlement Quality Meter Data associated with Loads within a DLAP, and that the currently-effective practices with respect to submittal of such data would remain in place and unaffected by the Second Supplement to the Draft Final Proposal. For clarity and to ensure that all parties fully understand the scope of the requirement being proposed, the Six Cities request that the CAISO confirm this in any final documents reflecting the outcome of this proceeding, such as, for example, any staff memoranda to the CAISO Board of Governors seeking approval, the CAISO’s filing to FERC requesting approval of the measures included in this initiative, or a similar document.**