



Stakeholder Comments Template

Market Settlements Timeline

This template has been created for submission of stakeholder comments on the Revised Straw Proposal meeting that was held on August 22, 2019. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com.
Submissions are requested by close of business September 6, 2019.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Modify settlements timeline

SMUD generally supports the Revised Straw Proposal regarding a new settlements timeline, subject to the caveats explained below.

2. Extend flexibility in publishing settlements/weekly invoices

SMUD supports the effort to increase the initial settlement statement quality by including price corrections and meter data. However, SMUD questions whether the level of effort required to make those changes is worth the benefit if the settlement statement containing price corrections and meter data would only be moved up 3 business days from the current process.

3. Reduce administrative costs for low value disputes

SMUD generally supports the \$100 minimum threshold for disputes based on the low level of materiality. However, SMUD agrees with other participants that certain past disputes for amounts less than \$100 have been submitted not because of disagreement with the CAISO calculation, but due to questions about *how* the calculation was performed. Accordingly, there should be a mechanism for getting calculation questions resolved in a timely manner.

In the previous stakeholder call, it was stated that market participants could submit calculation questions via the CIDI IMS ticket inquiry feature. There are some issues with this. CAISO will likely still receive the same number of inquiries, but the quantity will be split between the IMS ticket and dispute applications. If the goal is to reduce workload, this may not be a workable solution.

If this proposal is adopted, SMUD would like to request that the CAISO update its policies surrounding the CIDI IMS ticket application. For example, SMUD would like specific written guidelines as to when to submit an IMS ticket or a dispute. Additionally, SMUD requests the CAISO outline its responsibilities regarding response time to IMS tickets.

Additional comments

Invoice Publication Timing

SMUD is concerned about the CAISO's proposal to "clarify" tariff provisions regarding invoice publication timing. While SMUD has no issue with the four business day turnaround for payments, if the CAISO publishes an invoice after business hours on Wednesday (up until 5 a.m. on Thursday), this realistically leaves just three business days for market participants to process and make payment. This is a short-turnaround period. We recognize that the CAISO has occasional processing issues that may cause delay in publication, and under these abnormal situations, SMUD can rush to make payment within the shortened three business days. However, adding tariff language could normalize this extended publication timeline and codify the three-day turnaround into the standard process.