



Submitted by	Joint Parties	Date Submitted
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PacifiCorp Comments on the Market Settlements Timeline Issue Paper and Straw Proposal

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation (“CAISO”) on the Market Settlements Timeline Issue Paper and Straw Proposal published June 11, 2019, (“Straw Proposal”). PacifiCorp appreciates the opportunity to provide comments for the CAISO’s consideration. PacifiCorp is generally supportive of the CAISO’s proposals set forth in the Straw Proposal and provides more specific comments below.

Settlement Timeline

In the Straw Proposal, the CAISO proposes to re-align, consolidate, and extend the required settlement timeline within 60 business days after a trade date, which will include an initial required settlement statement seven business days after a trade date (“T+7B”) and a final required settlement statement at T+60B. The revised timeline would produce market price corrected settlement data at T+3B and T+5B, and include initial meter data submissions at T+4B and final settlement quality meter data submissions at T+52B. Further, the CAISO proposes to re-align and shorten the optional settlement timeline beyond 60 business days after a trade date and produce optional settlement statements, if necessary, at 12 months after the trade date (“T+12M”), T+21M and T+24M. PacifiCorp is supportive of these proposed timeline changes.

Dispute Deadlines

The CAISO proposes a 14-business day dispute window after publication of the T+7B settlement statement, and 22-business day dispute windows after publication of the T+60B, T+12M and T+21M settlement statements. PacifiCorp recommends that the duration of the dispute window for the T+7B settlements statement should be extended to 22 business days to align with the other settlement statement dispute windows. In comparison with the current timeline which includes 43 business days between the T+12B and T+55B settlement statements, the proposed timeline would include 53 business days between the initial settlement statement at T+7B and the T+60B settlement statement. PacifiCorp believes that the additional 10 business days between settlement statements should be sufficient to accommodate extending the dispute window from 14 to 22 business days.



Dispute Threshold

PacifiCorp is supportive of the CAISO's proposal to limit its consideration of revenue or charge dispute amounts of \$100 or more. However, during the stakeholder call, the CAISO stated that disputes submitted under \$100 that include an accepted placeholder request will be considered if the total amount for all trade days in the placeholder dispute is \$100 or more. PacifiCorp agrees with this statement and requests that the CAISO include this language in its next paper and any tariff and/or business practice manual revisions.

Other Comments

PacifiCorp requested during the stakeholder call that the CAISO include a sample payment and disputes calendar with the next paper, reflecting the proposed timeline, and reiterates that request in these written comments. In addition, PacifiCorp agrees with the CAISO's EIM Governing Body decisional classification of advisory authority, for the reasons stated in the Straw Proposal.

Conclusion

PacifiCorp appreciates the CAISO's consideration of these comments.