

Stakeholder Comments Template

Market Settlement Timeline Initiative Draft Final Proposal

Submitted by	Organization	Date Submitted
S. Kris Van Vactor (626)302-3158	Southern California Edison	10/10/2019

Please provide your organization's comments on the following issues and questions.

1. Proposal to re-align, consolidate, and extend the required settlement timeline within 70 business days after a trade date

Please provide your organization's feedback on this topic as described in section 6.3.1 of the <u>draft</u> <u>final proposal</u>. Please explain your rationale and include examples if applicable.

SCE does not oppose the realignment, consoldidation and extension of the required settlement timeline to within 70 days after the trade date.

2. Proposal to re-align and shorten the optional settlement timeline beyond 70 business days after the trade date

SCE does not oppose the realignment, consoldidation and extension of the optional settlement timeline to bo 70 days after the trade date.

3. Proposal to add flexibility in publishing statements and invoices.

SCE does not oppose adding flexibility in publishing statements and invoices

Additional comments

SCE is still somewhat concerned with CAISO's approach to managing EAL through this initiative. Ultimately policy changes should not adversely impact any market particants EAL management practices, but rather strive to make sure all market participants are not adversly impacted. SCE believes these change are enough to warrant another stakeholder initiative, which could be implemented at the same time as these requested changes.