

**COMMENTS OF IDAHO POWER COMPANY
ON CAISO’S PROPOSED CHANGES TO THE
METERING BUSINESS PRACTICE MANUAL
PRR 1266**

Submitted By	Company	Date Submitted
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Idaho Power Company (“Idaho Power”) appreciates the opportunity to comment on the California Independent System Operator’s (“CAISO”) proposed changes to the Metering Business Practice Manual (“BPM”), in PRR 1266. These changes reflect settlement timeline changes from the Settlement Timelines Transformation initiative.

In section 6.2.2 of the BPM, CAISO proposes to revise the deadline for submission of settlement quality meter data to 10:00 am on the 7th business day after the transaction date (T+7B). Idaho Power supports the move to T+7B, but questions why the hour deadline is being moved from the current 23:59:59 to 10:00 am. This change shortens the time market participants have to submit settlement quality meter data by nearly a full day. Further, it was not discussed in the initiative and may undermine the benefits of the move to T+7B. Market participants may have to revise their processes to ensure that meter data can be submitted by the new 10:00 am deadline, or else accept that their meter submissions will not occur until T+52B. CAISO should explain why it is making this change.

Idaho Power appreciates CAISO’s continued work on this BPM and the opportunity to comment.