



Department of Energy

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Bonneville Power Administration
P.O. Box 3621
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**CAISO Annual Policy Initiatives Roadmap Process
Comments on 2020 Final Policy Initiatives Catalog
Submitted by Bonneville Power Administration, September 19, 2019**

Submitted by	Company	Date Submitted
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Bonneville Power Administration¹ appreciates CAISO’s refinements to its 2020 Final Policy Initiatives Catalog. Consistent with the Draft Implementation Agreement², Bonneville proposed the EIM enhancement initiatives and priorities noted below on July 2, 2019 for the CAISO’s consideration in its 2020 annual plan and its 3-year policy initiative roadmap process commencing this summer.

1) Energy Imbalance Market closing timelines and Resource Sufficiency³

Bonneville supports the CAISO’s revisions to the scope of the discretionary initiatives 7.1.10 EIM Base Schedule Submission Deadline and 7.1.24 Real-Time Market and EIM Refinements to address the scope proposed by Bonneville.⁴ Bonneville also supports the timing indicated by moving 6.13 Real-Time Market and EIM Refinements into the Underway and Planned section of the Catalog. Bonneville also requests that the CAISO similarly assign EIM Base Schedule

¹ Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500 MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and then other regional entities prior to selling power out of the region.

² The Draft Implementation Agreement between CAISO and Bonneville is Attachment C to Bonneville’s June 20, 2019 Western Energy Imbalance Market Letter to the Region, *available at* <https://www.bpa.gov/Projects/Initiatives/EIM/Pages/Energy-Imbalance-Market.aspx>

³ This first proposal addresses Bonneville’s obligations under the Draft Implementation Agreement, section 14(g), 14(h)(i) and 14(h)(iii).

⁴ Comments Submitted July 2, 2019, Bonneville Power Administration, pages 1-3.

Submission Deadline a higher priority, either by folding it's scope into 6.13 or by initiating it in 2019 and assigning it an implementation timeline in the Fall of 2020 or 2021.

2) Resource Sufficiency – obligation transfers⁵

Bonneville supports the CAISO's continued inclusion of the initiative 6.7.3 Transferring Bid Range as a component of planned initiative 6.7 Extend Day-Ahead to EIM Entities. Bonneville agrees that such a product is an integral piece of a well-designed electricity market. Bonneville also agrees that it is important to ensure appropriate transmission requirements for such a product are met and that this should be addressed as part of the Extend Day-Ahead Market to EIM Entities (EDAM) policy initiative process. Assuming extending the day-ahead market to EIM Entities moves forward, Bonneville requests that the CAISO assign this initiative a high priority, initiate it the third quarter of 2019 as planned and assign it an implementation timeline in the Fall of 2020 or 2021.

3) Settlements – increased transparency⁶

Bonneville supports the CAISO's refinement of the scope and timing of the underway and planned initiative 6.13 Real-Time Market and EIM Refinements to address the increased transparency proposed by Bonneville.⁷

4) Settlements – dispute resolution timelines⁸

Bonneville is encouraged by the existing scope and progress of the initiative 5.8 Market Settlement Timeline Transformation that is currently underway, and Bonneville shares CAISO's optimism that this policy initiative will be completed in 2019.

5) Other changes

Bonneville is also encouraged by many of the changes made since the previous version and we highlight a few in particular. Bonneville supports the updates to the Greenhouse Gas (GHG) Attribution Approach for Day-Ahead and the addition of the EIM Governance Review Phase 2 initiative.

⁵ This second proposal addresses Bonneville's obligations under the Draft Implementation Agreement, section 14(h)(ii).

⁶ This third proposal addresses Bonneville's obligations under the Draft Implementation Agreement, section 14(h)(iiii).

⁷ Comments Submitted July 2, 2019, Bonneville Power Administration, page 4.

⁸ This fourth proposal also addresses Bonneville's obligations under the Draft Implementation Agreement, section 14(h)(iiii).