

Comments on CAISO's August 8, 2018 2019 Draft Policy Initiatives Catalog

August 22, 2018

CDWR would like to submit the following comments:

CDWR continues to support the two items it has requested in the past:

- 6.1.50 – Regulation Aggregated Pumps and Pumped Storage
- 6.2.2 – Congestion Revenue Rights Revenue Sufficiency, CRR Allocation

6.1.50 “Aggregated Pumps and Pumped Storage” was a CDWR-proposed study to explore improvements to Participating Load functionality. Sometime between the draft and final version of the 2017 catalog, CAISO renamed the item “Regulation Aggregated Pumps and Pumped Storage”. Since CDWR did not request a name change, CAISO did not provide an explanation, and the reference to regulation services is not clear, CDWR believes the name should revert back to “Aggregated Pumps and Pumped Storage”.