Environmental Defense Fund's Rankings

Initiative 1: 9.6 Standard Capacity Product Enhancements/9.7 Standard Capacity Product for Demand Response/9.8 Use-Limited Resource Adequacy Criteria and Must Offer Obligations.

		Criteria	HIGH	MEDIUM	LOW	NONE	Your Score
			10	7	3	0	Use 0, 3, 7, or 10
A		Grid Reliability	Significant Improvement	Moderate Improvement	Minimal Improvement	No Improvement	10
в	Benefit	Improving Overall Market Efficiency	Significant improvement	Moderate improvement	Minimal improvement	No impact	10
с	Be	Desired by Stakeholders	Universally desired by stakeholders	Desired by majority of stakeholders	Desired by a small subset of stakeholders	No apparent desire	$\left \right>$
D	Feasibility	Market Participant Implementation Impact (\$ and resources)	No Impact	Minimal Impact	Moderate Impact	Significant impact	10
E	Fea:	ISO Implementation Impact (\$ and resources)	No Impact	Minimal Impact	Moderate Impact	Significant impact	10
							40

High Level Prioritization Criteria Matrix

Grid Reliability (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

These three initiatives are tightly interrelated, and as a result EDF has bundled them together for the purpose of prioritization. If done appropriately, initiative elements would expand market access for distributed energy resources (DER) – particularly demand response (DR) – while simultaneously increasing market efficiencies. EDF is especially concerned that these initiatives include consideration of ways to create well-defined access for diverse bundles of DER to participate in the market.

Grid reliability will be improved by expanding the amount and diversity of resources able to contribute to the system.

Improving Overall Market Efficiency (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

These initiatives would improve market efficiencies by reduced unnecessary barriers and friction associated with participation. For example, lowering non-availability penalties to create a better fit between penalties and associated system costs would reduce a market entry barrier.

Market Participant Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) –

ISO Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) –

Initiative 2:_ 9.9 Voluntary Demand Response Auction.

			HIGH	MEDIUM	LOW	NONE	Your Score
		Criteria	10	7	3	0	Use 0, 3, 7, or 10
A		Grid Reliability	Significant Improvement	Moderate Improvement	Minimal Improvement	No Improvement	10
в	Benefit	Improving Overall Market Efficiency	Significant improvement	Moderate improvement	Minimal improvement	No impact	10
С	Be	Desired by Stakeholders	Universally desired by stakeholders	Desired by majority of stakeholders	Desired by a small subset of stakeholders	No apparent desire	$\left \right>$
D	Feasibility	Market Participant Implementation Impact (\$ and resources)	No Impact	Minimal Impact	Moderate Impact	Significant impact	10
E	Fea	ISO Implementation Impact (\$ and resources)	No Impact	Minimal Impact	Moderate Impact	Significant impact	10
							-

High Level Prioritization Criteria Matrix

Grid Reliability (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

EDF strongly supports continued progress on this initiative, which, if implemented appropriately, could be a game-changer in terms of expanding Preferred Resources' ability to participate in reliability markets. Grid reliability will be improved by expanding the amount and diversity of resources able to contribute to the system.

Improving Overall Market Efficiency (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

Creating effective auction mechanisms for Preferred Resources is central to improving market efficiencies, QED.

Market Participant Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) –

ISO Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) –

Initiative 3: 12.3 Combined Demand Response Product.

			HIGH	MEDIUM	LOW	NONE	Your Score
		Criteria	10	7	3	0	Use 0, 3, 7, or 10
A		Grid Reliability	Significant Improvement	Moderate Improvement	Minimal Improvement	No Improvement	10
в	Benefit	Improving Overall Market Efficiency	Significant improvement	Moderate improvement	Minimal improvement	No impact	10
с	Be	Desired by Stakeholders	Universally desired by stakeholders	Desired by majority of stakeholders	Desired by a small subset of stakeholders	No apparent desire	\mathbf{X}
D	Feasibility	Market Participant Implementation Impact (\$ and resources)	No Impact	Minimal Impact	Moderate Impact	Significant impact	10

High Level Prioritization Criteria Matrix

E	ISO Implementation Impact (\$ and resources)	No Impact	¹ Minimal Impact	Moderate Impact	Significant impact	10
					Total	40

Grid Reliability (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

This initiative would expand non-generating resources ability to provide multiple products, thereby enlarging the quantity and characteristics of potential participants in reliability markets. EDF is particularly interested in advancing ways in which different resources can be bundled together to participate markets. Grid reliability will be improved by expanding the amount and diversity of resources able to contribute to the system.

Improving Overall Market Efficiency (provide a detailed explanation of how and why this initiative provides an improvement in grid reliability) –

Increasing the number of market participants with a greater diversity of products will result in increased market efficiencies.

Market Participant Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) –

ISO Implementation Impact (\$ and resources) (provide a detailed explanation of what you expect the impact to be in terms of \$ and resources) – the impact to be in terms of \$ and resources) –