

Comments Of Financial Marketers Coalition on Annual Policy Initiatives Roadmap Straw Proposal

Submitted By	Companies	Date Submitted
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The Financial Marketers Coalition¹ (“Coalition”) appreciates the opportunity to comment on the California Independent System Operator’s (“CAISO”) July 18, 2017 Annual Policy Initiatives Roadmap Straw Proposal. Although the Coalition supports most of the proposed changes made by CAISO, including the proposal to update the policy initiatives roadmap twice a year, and the development of a three year roadmap, the Financial Marketers are concerned that by removing the ranking process CAISO will simultaneously eliminate stakeholders’ ability to advocate for the prioritization of projects. In particular, the Coalition expresses support for the positions expressed by XO Energy CAL, LP (“XO Energy”) and the Western Power Trading Forum (“WPTF”), which have urged the CAISO to develop a more transparent process by which the ISO and stakeholders are able to prioritize which initiatives are included in the roadmap.

1. The Financial Marketers Coalition Supports the Comments of XO Energy CA, LP and the Western Power Trading Forum

The Coalition supports and hereby incorporates by reference the Comments of XO Energy and the Comments of WPTF. As explained by these comments, CAISO’s proposal to eliminate the numerical ranking process for discretionary initiatives removes the ability for stakeholders to voice their opinion or justification why certain initiatives should be included in the roadmap over others. In particular, the Coalition supports XO Energy’s assertion that stakeholders’ direct participation in the prioritization process continues to be integral, and that absent such direct participation, CAISO will be granted unfettered discretion to develop the roadmap and determine which comments it chooses to consider. In addition, the Coalition strongly supports a continued dedication to the ISO Core Values, which include soliciting input and maintaining transparency, both in sharing ideas and distributing information to all market participants.

¹ The Financial Marketers Coalition is an industry trade group made up of independent power marketing companies that trade electricity at wholesale in all of the organized ISO and RTO markets. The coalition is an active participant in many ISO/RTO stakeholder proceedings as well as in proceedings before the Federal Energy Regulatory Commission. Many of the coalition members currently trade in the CAISO market, or are interested in doing so.

The Coalition encourages CAISO to consider these comments as it works towards developing a more effective and transparent method for stakeholders to participate in deciding which initiatives should be included in the one and three year roadmaps.

If you have further questions or would like to discuss these comments, please do not hesitate to contact Ruta Kalvaitis Skučas at (202) 530-6428 or RSkucas@pierceatwood.com, or Maeve Tibbetts at (202) 530-6435 or MTibbetts@pierceatwood.com.

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