

COMMENTS OF IDAHO POWER COMPANY ON CAISO’S FINAL POLICY INITIATIVES CATALOG

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”) final Policy Initiatives Catalog, dated August 29, 2018.

As it did in the draft catalog, CAISO has categorized the “EIM Offer Rules—EIM Resource Sufficiency Evaluation” initiative as “complete.”¹ Idaho Power does not believe that this initiative has been adequately addressed. As previously stated, a stakeholder initiative should be established to evaluate a broad set of changes to the resource sufficiency tests, particularly the flexible ramping test.²

Idaho Power understands that CAISO will be publishing a white paper detailing how it plans to address the issues that the Energy Imbalance Market (“EIM”) Entities have raised, and that CAISO plans to address some of the issues through Business Practice Manual (“BPM”) changes or in other initiatives (for example, in the initiative to consider

¹ CAISO Policy Initiative Catalog, p. 11 (Aug. 29, 2018).

² See Comments of Idaho Power Company on CAISO’s July 19, 2018, EIM Offer Rules Workshop, pp. 2-4 (Aug. 2, 2018), available at <http://www.cao.com/Documents/IPCComments-EIMOfferRulesTechnicalWorkshop-Jul19-2018.pdf>. Idaho Power reiterated its position in its Comments on the Draft Policy Catalog, available at <http://www.cao.com/Documents/IPCComments-2019DraftPolicyInitiativesCatalog.pdf>.

extending the day-ahead market to EIM Entities). Idaho Power appreciates and supports CAISO's willingness to implement BPM changes where appropriate, including the proposed BPM changes to the flexible ramping test.³ However, the most appropriate way to address the resource sufficiency tests would be in a comprehensive initiative focused on the tests, rather than piecemeal through a variety of forums that may be focused on a range of issues. A single comprehensive initiative would be the best way to ensure that the tests achieve their goals and do not lead to inefficiencies or other market problems.

Regarding the white paper, Idaho Power understands that CAISO does not intend to take comments after it is published. Idaho Power strongly encourages CAISO to allow a comment period after publication of the white paper and to consider any comments it receives. The white paper effectively represents decisions by CAISO staff regarding issues that are very important to EIM Entities. Interested stakeholders deserve an opportunity to comment on CAISO staff's decisions.

Idaho Power appreciates CAISO's work on the catalog. Idaho Power looks forward to continued collaboration with CAISO on this and other issues.

³ Idaho Power appreciates that CAISO plans to implement a tolerance band and limit freezes as a result of a test failure to the interval that was failed. See CAISO presentation on 15-Minute Day-Ahead Scheduling Granularity, Second Revised Straw Proposal, p. 24 (Sept. 4, 2018), *available at* <http://www.caiso.com/Documents/Presentation-Day-AheadMarketEnhancementsFifteen-MinuteGranularity-Sep42018.pdf>.