

Stakeholder Comments Template

Submitted by	Company or Entity	Date Submitted
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Comments Concerning Annual Policy Initiatives Roadmap Process Straw Proposal

The Modesto Irrigation District ("MID") thanks the California Independent System Operator Corporation ("CAISO") for the opportunity to submit comments following the July 25, 2017 stakeholder web conference regarding the CAISO's Annual Policy Initiatives Roadmap Process Straw Proposal.

MID supports the CAISO's proposal to no longer use the ranking system for selecting and prioritizing stakeholder initiatives for the following year. The ranking system, while well-intentioned, was time-consuming and confusing as to its effect and import on the Stakeholder Catalog. MID also supports the CAISO's proposal to use a three-year Roadmap to order and to time system change releases in a cost-effective and orderly fashion. If implemented correctly, the Roadmap will help stakeholders adapt to changes in CAISO systems in a streamlined manner, hopefully reducing costs not only in the installation of CAISO software and systems, but in training costs for those that use CAISO services.

MID echoes comments made during the July 25 web conference that there should be an opportunity for stakeholders to respond to initiatives proposed by stakeholders or CAISO staff and management. In order to reduce the burden of monitoring stakeholder initiative proposals year-round, MID concurs with some stakeholders who expressed that there should be a cut-off date several weeks prior to each of the February and August catalog issuances, such that stakeholders may comment on the need, potential harm or scope of proposals submitted to-date. Stakeholder initiatives submitted to the CAISO after the cut-off date would be considered for the next catalog issuance, and stakeholders would be able to comment as to those initiatives submitted after the cut-off date by the comment date established for the subsequent catalog issuance. MID understands that there may be instances due to unique circumstances, such as



regulatory mandates, where the CAISO may have to begin an expedited or emergency stakeholder process outside of the regular catalog timelines. MID's comments do not propose to hinder the CAISO's ability to initiate such processes.

MID also echoes stakeholder comments expressed on the July 25 call that the CAISO should provide advance notice of Proposed Deletions of stakeholder initiatives, such that stakeholders may comment as to whether there are needs for the continuation of the stakeholder initiative that the CAISO may be overlooking.

MID looks forward to continued participation in this stakeholder process.