

Portland General Electric Comments on the CAISO's 2018 Draft Policy Initiatives Roadmap and Catalog

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Portland General Electric ("PGE") appreciates the opportunity to provide comments on the California Independent System Operator's ("ISO") 2018 Policy Initiatives Draft Roadmap ("Roadmap") published December 7, 2017, and presented at the December 14, 2017, stakeholder meeting, and coinciding updates to the Draft Policy Initiatives Catalog ("Catalog").

General Comments

PGE understands that the ISO's resources are not unlimited, and that stakeholder initiatives must be prioritized. PGE for the most part agrees with the ISO's prioritization of initiatives as represented by their three-year Roadmap, and appreciates the ISO's explanation of how their chosen initiatives build on each other to deliver on the big-picture policy priorities the ISO has outlined.

PGE's Preferred 2018 Stakeholder Initiative Priorities

PGE appreciates that the ISO was able to prioritize the Hourly EIM Resource Sufficiency Evaluation initiative in response to overwhelming support from the EIM community and targeted beginning the stakeholder process in Q2-2018. Further, PGE appreciates that the ISO has fast-tracked the Imbalance Conformance initiative, and also appreciates the ISO's commitment to resolving the ongoing Commitment Costs and Default Energy Bid Enhancements and EIM GHG Enhancements initiative in Q1-2018.

Extend Day Ahead Market to EIM Entities

Following publication of the initial Catalog, the ISO introduced a new initiative aimed at developing in 2018 a set of Day-Ahead Market services that could be offered to the EIM entities as early as 2020 in order to reduce costs and increase benefits for EIM customers. Provided the ISO is able to continue to dedicate adequate time and resources to initiatives that support near-term enhancements to the existing EIM, and targets potential Day-Ahead Market services that complement a more robust EIM, PGE is fully supportive of this initiative and the priority it has been given in the Roadmap.