

Portland General Electric Comments on the CAISO's 2018 Final Policy Initiatives Roadmap

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Portland General Electric Company ("PGE") appreciates the opportunity to provide comments on the California Independent System Operator's ("ISO") 2018 Final Policy Initiatives Roadmap ("Roadmap"), which includes both the three-year Roadmap and a 2018 Annual Plan ("Annual Plan").

General Comments

PGE generally supports the ISO's Roadmap and appreciates the clarifications and adjustments made to the draft Roadmap as communicated to stakeholders in slides published January 12, 2018. PGE understands the ISO has a number of high-priority initiatives to complete in 2018 and looks forward to working with the ISO and its stakeholders to develop effective and efficient solutions to the issues identified. PGE also appreciates the ISO's efforts to map a multi-year vision that outlines key dependencies and leveraging opportunities between initiatives.

EIM Offer Rules

PGE strongly supports the ISO's inclusion of the "EIM Offer Rules" initiative in its Annual Plan. PGE appreciates the ISO's commitment to resolving in 2018 the critical disconnects in the current Real Time Resource Sufficiency test and issues related to bidding of resources with complex operational and economic considerations into the EIM identified by PGE and other EIM stakeholders. PGE agrees with the ISO that a discovery workshop is the most expedient way to begin this initiative to ensure all relevant issues are identified and prioritized for resolution, whether through a near-term policy initiative process leading to tariff changes, or through business practice manual changes or other immediate opportunities to address the critical issues.

PGE understands that the majority of these issues, which have been discussed by EIM stakeholders for multiple years, will need to be addressed near-term in order to facilitate the success of future ISO initiatives, such as the "Extend DAM to EIM Entities" initiative. PGE therefore requests the ISO make explicit reference to this initiative and its implementation track in the Roadmap to align expectations among stakeholders that resources will be dedicated to near-term implementation of the outcomes.

Extend Day Ahead Market to EIM Entities

While PGE supports this initiative and plans to participate fully in the market-design development, PGE believes the current timeline is aggressive. PGE asks that CAISO remains flexible on the timing of this initiative to allow for more thorough scoping and issue identification at the outset.

EIM Governing Body Categorization

PGE supports the request by the EIM Governing Body to review and potentially reclassify the appropriate Governing Body authority levels for near-term initiatives as their scopes are clarified.