

Portland General Electric Comments
CAISO 2020 Policy Initiatives Roadmap and Annual Plan Meeting

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Portland General Electric Company (PGE) appreciates the opportunity to provide comments on the draft 2020 Policy Initiatives Roadmap (Roadmap). PGE looks forward to continuing to work with the CAISO and fellow stakeholders as the 2020 policy initiatives processes moves forward. PGE agrees with the CAISO characterization of its policy initiatives as necessary to evolve markets; the proposed initiatives are robust, covering a host of issues.

EDAM Initiatives

PGE recognizes CAISO's difficulty in balancing the given initiatives outlined in the 2020 Roadmap. CAISO seeks to gain efficiencies in the Day-Ahead Market (DAME), better the current Energy Imbalance Market, and develop initiatives in support of the Extended Day-Ahead Market (EDAM). While there are certainly synergies for the initiatives laid out in the catalog, PGE believes that the EDAM presents a needed opportunity to build a Day-Ahead Market with the input of a broad spectrum of stakeholders within the EIM to ensure footprint-wide benefits. PGE expects that any initiative developed in DAME will not be finalized without first being harmonized successfully with the development of the EDAM. For example, the development of Flexible Ramping Enhancements must not only prove effective for DAME but must be informed by, and workable in the constructed EDAM.

In its catalog, CAISO identified initiatives under Section 5.7 (Extend Day-Ahead Market to EIM Entities or EDAM) that are crucial to the development of EDAM. PGE believes that key EDAM market elements, such as Transmission Access Charge (TAC) alignment, Day-Ahead Resource Sufficiency, and Greenhouse Gas (GHG) Attribution should be developed under the umbrella of EDAM. PGE would appreciate more clarity in the final roadmap of all the initiatives and market elements that will be developed in EDAM stakeholder processes.

2020 Policy Roadmap- New Process Guidelines

PGE supports the new process of refining key policy, tariff, and business requirement details for implementation of new initiatives prior to seeking CAISO Board of Governors (Board) approval. PGE seeks clarity as to whether tariff and business requirements need to be developed prior to going before the EIM Governing Body for initiatives where the EIM Governing Body has primary or hybrid authority. PGE suggests providing an illustrative example of a stakeholder initiative lifecycle in the framework of the new process.

Finally, PGE seeks reassurance from CAISO that it is staffed to tackle the vast spectrum of initiatives within the timeframe laid out in the Roadmap. PGE would like to see more detail in the Roadmap, demonstrating what resources CAISO staff intend to dedicate to the various initiatives. It would also be helpful to understand what technological and system hurdles CAISO has identified in its pursuit of evolving markets.