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Portland General Electric

Local Market Power Mitigation Enhancements Straw Proposal Comments

Portland General Electric Company (PGE) appreciates the opportunity to submit comments to the California Independent System Operator (CAISO) on the Local Market Power Mitigation (LMPM) Enhancements Straw Proposal issued November 25, 2015.

PGE believes increased accuracy in the application of LMPM would promote increased participation in the Energy Imbalance Market (EIM), both for companies who are considering joining the EIM and for existing EIM Entities who must decide whether and how to commit their participating resources to the EIM.

PGE supports the planned Spring 2016 enhancements to move the LMPM process from the Real Time Pre-Dispatch (RTPD) advisory interval to the RTPD binding interval.

PGE also supports the extension of the LMPM process to the Real Time Dispatch (RTD) window. While the under-predicted congestion instances for RTD have been relatively small to date (based on data provided by the CAISO in the Straw Proposal), PGE is concerned that this number will logically grow as additional EIM participants are added, and PGE therefore supports the CAISO's proactive approach to address the issue.

PGE appreciates the opportunity to provide comments and looks forward to working with the CAISO and its other stakeholders on these important issues.