



2019 Draft Policy Initiatives Catalog
Public Generating Pool Comments
August 22, 2018

Public Generating Pool (PGP) appreciates the opportunity to comment on the California ISO's 2019 Draft Policy Initiatives Catalog (Catalog). PGP represents ten consumer-owned utilities in Oregon and Washington that own more than 6,000 MW of generation, 96% of which is carbon-free. PGP offers comments on the EIM Identified Market Power Mitigation Enhancements and Resource Adequacy Requirements initiatives listed in the Catalog and requests the EIM Resource Sufficiency Evaluation be added as an initiative to the Catalog.

EIM Identified Market Power Mitigation Enhancements

PGP requests clarification regarding the scope of the EIM Identified Market Power Mitigation Enhancements initiative. In the July 19, 2018 EIM Offer Rules workshop, CAISO stated that it may consider implementation of a conduct and impact test. Consideration of a conduct and impact test was not explicitly included in the description of the initiative. As such, PGP requests consideration of a conduct and impact test to be explicitly included as part of this initiative.

Resource Adequacy Requirements

PGP requests that review of CAISO's Capacity Procurement Mechanism (CPM) Competitive Solicitation Process (CSP) be added to the list of topics to be explored as part of the Resource Adequacy Requirements initiative. Over the last couple of months, there has been a lack of clarity on CAISO's monthly and intra-monthly CPM CSP regarding what options are available for participation of external resources. In any case, there appear to be significant barriers for external resources to participate in these processes. PGP requests CAISO initiate a review of its CPM processes to explore ways to allow for greater participation of external resources.

EIM Resource Sufficiency Evaluation

PGP requests that CAISO explicitly include an EIM Resource Sufficiency Evaluation initiative in the Catalog that addresses changes to the resource sufficiency tests that improve accuracy and certainty of the tests. PGP believes the resource sufficiency evaluation is foundational to ensuring a durable and well-functioning EIM. For this reason, PGP believes modifications to resource sufficiency merit a comprehensive review of the test within a stakeholder process, rather than being parsed out between various initiatives and Business Practice Manual changes.

Comments submitted by:

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