



## **2020 Draft Policy Initiatives Catalog Public Generating Pool Comments August 29, 2019**

Public Generating Pool (PGP<sup>i</sup>) appreciates the opportunity to comment on the California ISO's 2020 Draft Policy Initiatives Catalog (Catalog). PGP offers comments on the GHG Attribution Approach for Day-Ahead, Real-Time Market and EIM Refinements, and EIM Base Schedule Submission Deadline initiatives.

### **6.7.4 GHG Attribution Approach for Day-Ahead**

In the 2020 Revised Draft Policy Initiatives Catalog, CAISO states that it will need to extend the GHG attribution approach from the EIM to the extended day ahead market. However, in its presentation provided at the June 18, 2019 Regional Issues Forum, the California Air Resources Board (CARB) stated that "Expansion of the day-ahead market and regionalization will require different [GHG attribution] approaches and additional coordination." CAISO has also stated in public forums that the current GHG Attribution Approach used for the EIM is not workable for an extended day ahead market.

PGP requests CAISO modify the description of this initiative to make clear that CAISO is not simply extending the current EIM GHG Attribution Approach to an extended day-ahead market. But rather that CAISO will need to develop a new GHG attribution approach for the extended day ahead market that may also be applied to the EIM.

### **7.1.24 Real-Time Market and EIM Refinements**

In its presentation to the EIM Governing Body on June 28, 2019 regarding the decision on the Real-Time Market Neutrality Proposal, CAISO stated that it would include a comprehensive review of offset and uplifts within the scope of real-time market enhancements scheduled for next year. Yet the Real-Time Market and EIM Refinements initiative is categorized as "Discretionary" in CAISO's Catalog. Given the errors addressed in the Real-time Market Neutrality Settlements initiative, PGP believes it is imperative that the comprehensive review of offset and uplifts is prioritized in CAISO's 2020 Roadmap of initiatives. Given the commitment to additional review to assure the changes have achieved the desired effect, PGP requests that this item be categorized as "Currently Underway and Planned."

### **7.1.10 EIM Base Schedule Submission Deadline**

PGP notes that the scope of this initiative - to examine moving the final base schedule submissions closer to the operating hour (for example T-30) – is important to PGP member utilities in relation to BPA joining the EIM. Moving final base schedule submissions closer to the operating hour will allow BPA to better integrate its products and services with participation in the EIM. PGP requests this initiative be undertaken, completed, and implemented prior to BPA joining the EIM.

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<sup>i</sup> PGP represents eleven consumer-owned utilities in Washington and Oregon that own almost 8,000 MW of generation, approximately 7,000 MW of which is hydro and over 97% of which is carbon free. Four of the PGP members operate their own balancing authority areas (BAAs), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA. As a group, PGP members also purchase over 45 percent of BPA's preference power.

Comments submitted by:

Laura Trolese, [ltrolese@publicgeneratingpool.com](mailto:ltrolese@publicgeneratingpool.com), (360) 513-6465  
Therese Hampton, [thampton@publicgeneratingpool.com](mailto:thampton@publicgeneratingpool.com), (360) 852-7366