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via e-mail: [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com)

**Subject: 2017 Policy Initiatives Roadmap**

The Public Generating Pool (PGP) appreciates the opportunity to comment on the 2017 Stakeholder Policy Initiatives Roadmap (Roadmap) dated December 15, 2016.

**Request for a response to comments**

PGP appreciates the effort involved in preparing, drafting and finalizing the annual Roadmap. As noted in the Roadmap, 42 parties provided comment on 40+ discretionary initiatives. Comments focused on different initiatives, many comments were similar, and many comments were diverse. PGP believes it would be helpful for the ISO to provide a high-level response to comments. Otherwise it is difficult for stakeholders to understand the rationale behind the ISO's final ranking of initiatives.

For the 8 discretionary initiatives that the CAISO prioritized in the Roadmap, a succinct but helpful summary of comments received and ISO rationale was provided. For instance, on the Export Charges initiative, CAISO indicated that stakeholders commented this initiative would provide more market efficiency benefits than currently ranked. However, the ISO was not convinced that the elimination of export charges would greatly affect the economics of purchasing exports.

There were several other initiatives that were not prioritized that received significant stakeholder comment. These initiatives could benefit from a similar succinct response to comments. For example, Enhancing Participation of External Resources in the EIM received 13 comments suggesting that the "desired by stakeholders" category be increased. If that criteria had been increased, the total score would have been equal to the #5 – 7 initiatives included in the Roadmap. It is apparent that the CAISO was not convinced by the rationale provided in stakeholder comments to increase the ranking. However, it would be helpful to stakeholders to understand why the CAISO did not adjust the ranking.

**Mid-Year Adjustments**

CAISO noted in the Roadmap that some stakeholders provided comment for improving the process, including the addition of a mid-year abbreviated catalog and roadmap process. Given the many changes in the industry, PGP encourages the CAISO to not wait until 2018 to contemplate this change to the process, but begin in 2017 with a mid-year adjustment process.

**Prioritization across ISO, EIM, and Regionalization.**

PGP provided comment on the draft Roadmap that the CAISO's traditional process of maintaining a constant level of staff, despite the addition of the EIM, and allocating their time based on the Initiative Prioritization process may need some adjustment. Specifically, PGP asked the CAISO to consider allocation of some base level of staff to each of the ISO, EIM and regionalization categories and then

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prioritize initiatives by category rather than across all categories. PGP continues to encourage the CAISO to evaluate ways to ensure that an appropriate level of resources are dedicated to EIM Initiatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Therese Hampton". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Therese Hampton, Executive Director  
Public Generating Pool