

Submitted by	Company	Date Submitted
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RE: CAISO’s Revised Draft Policy Initiatives Catalog

The Public Power Council (PPC) thanks the CAISO for the opportunity to comment on its Revised Draft Policy Initiatives Catalog. As the Energy Imbalance Market continues to expand across the west – and with the potential for an Extension of the Day Ahead Market into that imbalance market – it is important that CAISO consider a diversity of perspectives, such as those of Northwest public power, when developing its Initiative Catalog and subsequent Initiative Roadmap. We appreciate the attention and prioritization given to EIM-specific issues in the last year and hope to see that focus continue or expand in the 2020 Initiative Roadmap.

PPC thanks CAISO staff for all their hard work on the initiatives that were undertaken in 2019 and we look forward to another productive year of stakeholder processes in 2020.

2019 Completed Initiatives

5.8 Market Settlement Timeline Transformation

Consistent with the Policy Initiatives Catalog submission from BPA on July 2, CAISO should endeavor to increase the time available to review and dispute transactions included on the T+3B, T+12B and T+55B settlement statements. This additional time for review is important for PPC members who will receive pass-through charges from BPA related to these settlements, should the agency join the EIM. We appreciate that this is slated for approval from the EIM Governing Body and CAISO Board of Governors in 2019. We hope to see this change implemented prior to BPA’s potential participation in March 2022.

Underway/Planned Initiatives

6.4 Day Ahead Market Enhancements

PPC appreciates the CAISO’s work to improve the Day Ahead Market. We have submitted comments separately on this initiative but would like to reiterate the request that the CAISO consider aligning the timing of this initiative with the release of the EDAM feasibility study in order to better inform the discussion. Different solutions may be necessary depending on whether the scope is to find solutions for the existing market or an extended day ahead market.

6.7 Extend Day-Ahead Market to EIM Entities

Currently, the initiatives associated with EDAM are classified under the EIM Governing Body's advisory authority. While specific considerations may need to be made for individual initiatives, generally these initiatives should be under the EIM Governing Body's primary authority.

6.7.4 Greenhouse Gas Attribution Approach for Day Ahead

As currently described, this initiative would simply extend the current EIM GHG attribution rules to the day ahead. PPC has serious concerns about whether the current EIM GHG attribution rules would be workable in a day ahead market. The initiative should be revised to clarify that it will explore options for GHG attribution rules in the Day Ahead Market.

Discretionary Initiatives

7.1.10 EIM Base Schedule Submission Deadline

Moving the base schedule timeline to T-30 instead of T-40 is an important change for many of PPC's members in the context on BPA's potential EIM participation. This change will better align with the scheduling timeline for other BPA products and should be in place prior to BPA's potential participation in the EIM in March 2022.

7.1.24 Real-Time Market and EIM Refinements

Included in this initiative is the review for "the need for real-time settlement changes such as settlement charge codes, uplift payments, offsets, and loss calculations to ensure they are consistent with cost allocation principles." Given the issues uncovered during the Real-Time Market Neutrality Settlement initiative, CAISO should prioritize this portion of the Real-Time Market and EIM Refinements initiative and pursue this review as soon as possible. The potential for additional settlement errors is a large concern for PPC members who would be impacted by pass-through charges from BPA if it joins the EIM and/or are either planned or potential EIM participants. A review should be conducted expeditiously to ensure there are no additional errors where settlements are either misaligned with cost allocation or are implemented contrary to the intended CAISO policies' needs. We ask that CAISO conduct this review of settlements in 2020.