

Portland General Electric Comments
CAISO Draft 2020 Policy Initiative Catalog

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Portland General Electric Company (“PGE”) appreciates the opportunity to provide comments on the draft 2020 Policy Initiatives Catalog. PGE looks forward to continuing to work with the ISO and fellow stakeholders as the 2020 policy initiatives catalog process moves forward. PGE continues to support the majority of the ISO’s in-progress stakeholder initiatives, including the Intertie-Deviation Settlement and Imbalance Conformance Enhancement initiatives.

EIM Governance Review

PGE looks forward to a robust review of the EIM Governance as it is both crucial to the current Western EIM and to the development of the EDAM. PGE feels strongly that the expansion of primary authority of the EIM Governing Body should be a priority for the CAISO to ensure that changes to the real-time market and extension of the day-ahead market have full and proper review by the EIM Governing Body. We hope that the review is a priority leading to greater autonomy and greater long-term stability for the EIM Governing Body.

Extend Day-Ahead Markets to EIM Entities (EDAM)

PGE supports the initiatives identified under 5.10 and will actively participate on shaping these processes. PGE is concerned that these initiatives are categorized as “E2- EIM GB Advisory.” We believe that these initiatives should be categorized as “E3-EIM GB Hybrid Primary.” The EIM Governing Body should have access to staff and the EIM Entities to stay adequately informed as the initiative develops. At a minimum, the primary driver of the EDAM is shared between full market and the Western EIM and the “E3” classification better captures PGE’s desired role for the EIM Governing Body.

PGE supports the initiative to align Transmission Access Charge (TAC) in support of EDAM development but believes the EDAM can develop without complete resolution on a TAC. Finding a resolution on a TAC should be prioritized accordingly.

PGE continues to highlight the need for resolution of the Day-Ahead Resource Sufficiency Evaluation as the EDAM develops and appreciates CAISO’s prioritization of the initiative. PGE maintains that Resource Sufficiency improvements are a top priority and that CAISO staff should be committed accordingly.

Discretionary Initiatives:

Further, PGE supports the following discretionary initiatives:

- EIM Base Schedule Submission Deadline
- EIM Contingency Price Correction
- Settlement of Non-Conforming Loads in EIM Balancing Areas

PGE looks forward to continuing to work with the ISO and fellow stakeholders on the 2020 Policy Initiative stakeholder processes.