

Portland General Electric Comments on the ISO's Annual Policy Initiatives Roadmap Straw Proposal dated July 18, 2017

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Portland General Electric

On October 1, 2017, Portland General Electric (PGE) will become the fifth entity to join the Western Energy Imbalance Market (Western EIM). At that time, PGE will begin managing its diverse generation and transmission assets according to the rules of the Western EIM. PGE will also continue to participate in the California Independent System Operator's (ISO) forward intertie markets. As such, PGE has a vested interest in policy development for the ISO's full market and the Western EIM.

Comments

In general, PGE supports the ISO's Annual Policy Initiatives Roadmap Straw Proposal (Straw Proposal). PGE believes it will be a significant improvement on the existing Stakeholder Catalog process and will reduce process-related delays.

However, PGE is concerned the Straw Proposal does not adequately address how internal resource-directing or long-term strategic vision decisions will be made, specifically with regard to meeting the increasingly critical market-evolution needs of the Western EIM. The ISO states, "[T]he Energy Imbalance Market is an extension of the CAISO's real-time market and therefore is included in development of the strategic vision and three-year market vision roadmap." However, to PGE's knowledge it has not been outlined how the EIM Governing Body, and the diverse and growing set of Western EIM stakeholders, will be able to influence those visions (which have to date been set by California-centric interests) or the allocation of ISO resources to meeting Western EIM interests. In PGE's view, the EIM Governing Body should have a formal role on the front-end of the process in addition to maintaining its current approval function for market enhancement initiatives directly linked to the Western EIM, and should have a role in informing the budget setting process to ensure adequate human and IT resources are procured to meet Western EIM market-enhancement and facilitation needs. PGE also believes the Regional Issues Forum discussions should be taken into consideration as well when setting a vision for the future of the ISO's markets, including for the Western EIM.

Conclusion

PGE appreciates the opportunity to submit these comments and looks forward to continuing to work with the ISO, as well as its market participants and stakeholders, to maximize the value of the Western EIM as its footprint expands.