

## Comments of Powerex Corp. on 2019 Final Policy Initiatives Catalog

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Powerex appreciates the opportunity to submit suggestions for inclusion in the 2019 Final Policy Initiatives Catalog (“Catalog”). With one exception, discussed further below, Powerex generally believes the Catalog accurately reflects the topics raised by stakeholders for potential consideration during 2019. Powerex appreciates CAISO staff’s receptiveness and consideration of stakeholder input in the development of the Catalog.

Powerex does believe, however, that changes are necessary with regard to item 4.8 *EIM Offer Rules - EIM Resource Sufficiency Evaluation*. This topic is categorized as an “initiative completed since previous catalog,” which Powerex believes is inaccurate. CAISO held two stakeholder workshops in which the EIM resource sufficiency (“RS”) evaluation was discussed, and also accepted post-workshop comments from stakeholders. Ultimately, CAISO determined that it would not convene a stakeholder process dedicated to this issue at all, but will instead address discrete aspects either through other stakeholder initiatives or under its existing authority (*i.e.*, without a stakeholder process at all). The Catalog states that CAISO plans to issue a “white paper in September 2018 detailing its action plan” on this topic. Given that most if not all of the stakeholder issues raised with regard to the RS evaluation remain unresolved, Powerex believes it is not accurate to categorize this topic as a “completed initiative.”

Moreover, Powerex is concerned that a piecemeal approach to revising the RS evaluation will not give adequate consideration to all of the issues that have been raised by stakeholders. The workshops demonstrated that there is extensive stakeholder interest in improving the workability of the RS evaluation, as well as ensuring it is applied accurately and consistently to all balancing authority areas (“BAA”), including the CAISO BAA. A fragmented approach to improving the RS evaluation prevents consideration of comprehensive, internally-consistent enhancements. In addition, a fragmented approach is likely to result only in those changes that are linked to other initiatives deemed to be of greater priority (such as 15-minute market granularity).

Finally, the purpose of the Catalog is to accurately reflect the topics that stakeholders have identified as potential initiatives to be considered in 2019. Powerex therefore requests that the Catalog be revised to accurately include the *EIM Offer Rules - EIM Resource Sufficiency Evaluation* as a proposed comprehensive initiative for consideration in 2019, recognizing that the ultimate prioritization of this, and other, proposals will be addressed in the development of the stakeholder initiatives “roadmap.”