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Subject: Initial Proposal - Annual Policy Initiatives Roadmap Process

The Public Generating Pool (PGP) appreciates the opportunity to provide comment on the Annual Policy Initiatives Roadmap Process. PGP appreciates the ISO's review and evaluation of stakeholder comments submitted in response to the 2016 Policy Initiatives Roadmap Process. In general, PGP believes the recommendations made by ISO in the Straw Proposal will improve the Roadmap Process.

Support High-Level 3-Year Roadmap and Elimination of Ranking

PGP supports the inclusion of a high-level 3-year roadmap. PGP believes this will provide important context and a sense of continuity to the Policy Initiative planning process. In addition, PGP supports the removal of the ranking of discretionary activities. Although PGP found the application of criteria to assess the potential market benefit and feasibility of implementation helpful, the quantitative ranking process did not seem to be useful or meaningful in determining priorities.

Additional Information About Criteria Used to Prioritize Initiatives

With the elimination of the quantitative ranking process, PGP does have questions about how the ISO will determine which potential policy initiatives will be selected for the proposed roadmap. The Straw Proposal indicates that the Annual Policy Initiatives Roadmap "will be linked to the strategic vision goals as well as the policy priorities found in the three-year vision." PGP is not familiar with the process associated with the development and communication of the strategic vision goals and policy priorities. Do these goals and priorities reflect input from stakeholders?

Further, as mentioned above, PGP does believe the previous criteria used that included assessment of the potential benefits to the market and the ease of implementation were valuable considerations. Will the ISO apply any additional criteria beyond those from the strategic vision to select initiatives for the proposed roadmap?

Recommend Mid-Year Adjustment to Roadmap

PGP would like to clarify the intent of our comments submitted during the 2016 Roadmap Stakeholder process. Specifically, we commented:

"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."

PGP's interest for a mid-year adjustment was to provide for a re-evaluation of the roadmap based on actual resource availability and revised urgency of specific issues. PGP envisioned that re-evaluation would provide for addition of new issues that emerged early in the year, and the potential for reprioritization based on actual availability of resources or emerging market conditions or needs.

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The recommendation in the Straw Proposal provides for the addition of new issues to the Catalog, but does not provide any opportunity to reprioritize based on resource availability or market needs. PGP recommends that the ISO modify the proposed mid-year update process to allow for a simplified re-evaluation of the Roadmap priorities. PGP also recommends that the update and evaluation be targeted for completion in May rather than February to better reflect a mid-calendar year adjustment.

PGP appreciates the efforts of the ISO to improve the Policy Initiatives Roadmap Process and appreciate the opportunity to provide comment.

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