

# Comments of Seattle City Light on CAISO 2019 Final Policy Initiatives Catalog

Submitted by	Company	Date Submitted
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Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates hydroelectric resources with approximately 2,000 MW of flexible, fast-ramping capacity. We regularly transact in the wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Energy Imbalance Market (EIM) in April 2020.

Seattle City Light (SCL or Seattle) appreciates the opportunity to submit comments on CAISO’s Final 2019 Policy Initiatives Catalog.

Seattle continues to recommend that CAISO prioritize work on the Local Market Power Mitigation Enhancement initiative. We believe the clarification that this initiative will encompass not only additional DEB options in the EIM but local market power mitigation issues in the EIM and application to other CAISO markets is helpful. Given the breadth and depth of this initiative we recommend that CAISO consider addressing this initiative in two-phases. The first phase could address EIM DEB options and mitigation issues and the second phase could consider application of changes to CAISO markets outside of EIM.

Seattle’s preference remains that CAISO pursue a stand-alone resource sufficiency test initiative, however, in the absence of this we are pleased that CAISO is planning to produce a whitepaper describing how it will address resource sufficiency program concerns raised by stakeholders. We look forward to reviewing this whitepaper. We recommend that CAISO clearly document the schedule, venue and opportunities for stakeholder comment on enhancements in the whitepaper.

Finally, Seattle continues to encourage CAISO to include and prioritize the initiative “Settlement of Non-Conforming Loads” in the policy road map.