

**Seattle City Light Comments on  
Regional Integration and Energy Imbalance Market Greenhouse Gas Initiative  
May 23, 2018**

Seattle City Light (City Light) is pleased to submit these comments regarding the California Independent System Operator's (CAISO) EIM Greenhouse Gas Enhancements Third Revised Draft Final Proposal (EIM GHG Proposal), issued on April 25, 2018.

Seattle City Light provides retail electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. City Light relies on hydroelectric resources for more than 90% of the energy we deliver to our customers. Meaningful action on greenhouse gas (GHG) emission reductions is a critical issue to the City of Seattle, and we are proud to be GHG neutral as an electric utility since 2005. City Light has 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.

**Comments**

City Light thanks the CAISO for its responsiveness to stakeholder concerns regarding the minimum bid price. As expressed in earlier comments, City Light had significant concerns with this aspect of the proposal, which appeared to create a hurdle rate that discriminated against zero-emitting resources in the EIM. We support the elimination of the minimum bid price in this proposal, as it resolves this concern.

City Light supports the remaining element of CAISO's proposal to limit the GHG MW bid quantity of EIM participating resources to the MW value between the EIM participating resource's base schedule and the resource's upper economic level.

We also believe that stakeholders would benefit from additional discussion of how the proposed EIM GHG policy would be adaptable in the situation where one or more other states adopt cap and trade or a carbon tax, which are under consideration in the Pacific Northwest. City Light encourages CAISO to continue to collaborate with the California Air Resources Board on further refinements to EIM GHG policies.

Thank you for this opportunity to comment. Please don't hesitate to contact Stefanie Johnson at (206) 386-4539 or [stefanie.johnson@seattle.gov](mailto:stefanie.johnson@seattle.gov) for any questions or clarifications regarding these comments.