## 2017 Stakeholder Initiatives Catalog

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SDG&E appreciates the opportunity to comment on the ISO's 2017 Stakeholder Initiatives Catalog.

## Support

SDG&E supports the Multi-Stage Generator Bid Cost Recovery initiative to review the allocation of costs between day-ahead and real-time markets for MSG units.

SDG&E supports the Combine IFM/RUC with Multi-Day Unit Commitment initiative. This initiative would provide better optimization of resource dispatches over a longer term horizon.

SDG&E supports the Exceptional Dispatch Decremental Settlement initiative. This would solve an issue when a unit is at min load and then dispatched offline. The current ED settlement does not compensate the unit because there is no bid for being at min load.

SDG&E supports reviewing the CRR process in sections 12.1, 12.2 and 12.9 of the catalog. The revenue inadequacy seen within the current program seems to be unsustainable and should be revisited.

SDG&E believes the ISO should combine sections 14.2, 14.3 and 14.4 into a singular initiative to review the entire MIC allocation process and also offer market participants an efficient means of procuring needed MIC rather than only through a bilateral market.

## **Proposed Addition**

SDG&E requests the ISO to add an initiative to develop NQC values for resources based on an ELCC methodology. This issue was originally brought up within the regional resource adequacy initiative and the ISO mentioned that it would start such an initiative. SDG&E believes the ISO should start this initiative without regionalization taking place as it is a fundamental part of the RA framework itself.

## **Does Not Support**

SDG&E does not support Economic and Maintenance Outages initiative. This initiative would only remedy a symptom not the root cause of the missing money issue within the capacity and energy markets.