

## Western Power Trading Forum Comments on the Stakeholder Catalog Initiative

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WPTF appreciates the opportunity to submit comments on the ISO's Stakeholder Catalog Initiative results. We offer some process-related feedback and a specific request.

### Process Feedback

The CAISO's Stakeholder Initiative Catalog Process requires refinement, and we offer areas in particular for the ISO's focus. First, the process is ineffective if a significant number of participants rank an initiative high two years in a row, but the ISO nonetheless devotes no resources to it. The catalog process requires a significant amount of stakeholder work: to review the catalog descriptions offered by the ISO including changes the ISO has made to categories, to consider and submit comments on what should be included or not included, to reconsider changes to the ISO's catalog, and then to vote on and justify selecting a very small number of initiatives from a very long list. If a participant's input consistently does not bear fruit in terms of devotion of ISO staff time, then the process is not meaningful. In particular, if the participants specify how they want their time and the ISO's time spent, only to have the ISO respond that they do not agree that those things the stakeholders identified are worth the time, then it is clear that the ISO is not honoring the input provided by participants.

Secondly, the ISO needs to clarify the treatment of input by associations. WPTF goes to great lengths to assimilate the input of its members, often leaving aside some important issues to find those that are valued the most by its collective members. Yet the ISO often justifies its choices by stating that "few market participants wanted...[a particular initiative]". This perspective does not appear to recognize that the input of associations represents the views of many market participants, not just one. We ask the ISO to clarify if it is the case that a consortia's ranking is only going to be counted as one participant's ranking. To the extent that's the case, we will then ask our membership to "stuff the ballot box" so to speak.

### Specific Request for 2014 Road Map

For the last two years WPTF has specifically requested that the ISO consider the application of extended LMP pricing. There is little on the horizon in the ISO's road map that will have the prices reflect the full costs to provide the energy in the market. We ask the ISO to take initial steps, beginning to discuss with its stakeholders the ELPM option. An initial exploratory step will not take an inordinate amount of resources of its stakeholders. In fact it will likely take less time than does the stakeholder catalog ranking process itself.

Thank you for your consideration.