

Western Power Trading Forum Comments on Annual Policy Initiatives Roadmap Straw Proposal

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About the Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency in order to facilitate transactions among market participants. The membership of WPTF includes load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities, all of which participate actively in the California market, and other such markets in the West and across the country.

Comments

WPTF appreciates the opportunity to provide comments on the Annual Policy Initiatives Roadmap Straw Proposal Posted on July 18, 2017 and the discussion on the stakeholder call on July 25, 2017. We want to commend the ISO for being receptive to the stakeholder comments submitted in the most recent Annual Policy Initiatives Roadmap Process and proposing changes to the process.

WPTF believes this proposal, while is a step in the right direction, fails to fully address the primary concern of those raised by stakeholders, which was a more transparent process by which the ISO *and stakeholders* are able to prioritize which initiatives are included in the roadmap. The current proposal, to eliminate the ranking process, while found to be inefficient, is not replaced with any mechanism for stakeholders to communicate which issues are of top priority other than submitting comments; this essentially removes the ability for stakeholders to voice their opinion or justification why certain initiatives should be included in the roadmap over others at the onset of the process. Stakeholders should still be given an opportunity to collaboratively determine, and in a transparent manner, upfront which issues are addressed first rather than leave that discretion up to the ISO to initially develop the roadmap and then determine which comments they should take into consideration.

WPTF is generally supportive of the other aspects of the proposal. Specifically, the proposal to update the policy initiatives roadmap more frequently a year, develop both a one-year and three-year roadmap, and the ability for stakeholders to identify issues throughout the year to be included in the catalog.

However, WPTF cannot fully support the proposal without a way by which stakeholders are still able to more directly participate in deciding which initiatives are included in the roadmap.

WPTF looks forward to continue working with the ISO to determine a more optimal method by which stakeholders and the ISO are able to efficiently and accurately determine which initiatives to include in the one- and three-year roadmaps.