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**Day Ahead Market Enhancements
 Comments on the Issue Paper/Straw Proposal dated February 28, 2018**

Middle River Power, LLC (“MRP”) is the asset manager for both MRP’s 830 MW High Desert Power Project (“HDPP”) and 270 MW Coso Geothermal (“Coso”) as well as other assets across the US. HDPP is located adjacent to Southern California Logistics Airport (formerly George Air Force Base) in Victorville, California. Coso is located on the China Lake Naval Air Weapons Station in Inyo County, California. MRP is pleased to have this opportunity to submit comments regarding the Day Ahead Enhancements Issue Paper and Straw Proposal ¹.

The California Independent System Operator Corporation (“CAISO”) proposes to move from an hourly to a fifteen-minute Day-ahead Market (with hourly bids and fifteen-minute schedule settlement), to combine the Integrated Forward Market (“IFM”) and Residual Unit Commitment (“RUC”), and to add a new “biddable” Day Ahead Imbalance Reserves (downward and upward) product. MRP is generally supportive of the CAISO proposal. However, MRP suggests that CAISO can significantly improve the proposal by including fifteen-minute bid granularity in the Day Ahead Market and consider allowing for the bidding and scheduling of ramping energy in fifteen-minute blocks as part of the process.

MRP is particularly supportive of the proposed Day Ahead Imbalance Reserves (downward and upward) product, which would send clear market signals of the value of flexible, reliable generation resources. The Day Ahead Imbalance Reserves will be awarded to resources that submit economic bids; and unlike RUC availability bids today, resource adequacy resources should not be required to bid \$0.00. Resources that are awarded imbalance reserves should be paid the marginal clearing price.

¹ <http://www.caiso.com/Documents/IssuePaper-StrawProposal-DayAheadMarketEnhancements.pdf>