



Stakeholder Comments Template

Commitment Cost and Default Energy Bid Enhancements

This template has been created for submission of stakeholder comments on the revised draft tariff language and associated March 19 meeting discussion, for the Commitment Cost and Default Energy Bid Enhancements (CCDEBE) initiative. The proposed draft language, the stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com.
Submissions are requested by close of business **March 26, 2020**.

Submitted by	Organization	Date Submitted
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Please provide your organization's general comments on the following issues and answers to specific requests.

1. Commitment Cost Bid Multiplier

Please provide your organization's feedback on the proposal to reduce the multiplier used to calculate default commitment cost bids from 125% to 110%. Please include examples and/or point to specific data as to whether a 110% multiplier, combined with the ability to further increase a resource's default commitment cost bids, provides for adequate cost recovery and is consistent with business needs.

2. Pricing Data

Please provide your organization's feedback on the gas pricing data analysis discussed during the March 19 web meeting and whether it supports a 110% multiplier in default commitment cost bids.

3. Additional comments

Please offer any other feedback your organization would like to provide from the revised draft tariff language proposed for FERC resubmittal, including the topics discussed during the March 19 web meeting.

Portland General Electric appreciates the opportunity to submit these comments on the CAISO's Commitment Cost and Default Energy Bid Enhancements (CCDEBE) Resubmittal discussed with stakeholders on March 19, 2020. PGE supports the

comments of the Western Power Trading Forum (WPTF), specifically the request that CAISO defer the filing until all the elements of CCDEBE can be implemented together as it was originally discussed and designed throughout the entire stakeholder process. PGE does not support the notion that the ability to update fuel costs during extreme (albeit sporadic) days of price volatility outweighs the cost of reducing commitment cost offers to 110% on all other days. Moreover, PGE is not persuaded by the concerns raised by CAISO staff that implementing these changes is somehow paramount to ensuring compliance with FERC Order 831. As WPTF has pointed out, CAISO has other options to address FERC Order 831 that would not contravene bidding flexibility via a lower commitment cost bid cap.