



**Department of Energy**

May 17, 2018

Bonneville Power Administration  
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**CAISO 2018 Regional Integration and EIM GHG Compliance Initiative  
Bonneville Power Administration Comments**

Submitted by	Company	Date Submitted
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The Bonneville Power Administration (BPA) appreciates the opportunity to comment on the California ISO’s 3<sup>rd</sup> revised final proposal on the regional integration and EIM greenhouse gas compliance initiative and May 2, 2018 workshop. BPA supports the accurate and equitable accounting of greenhouse gases (GHG) and applauds the considerable amount of time and effort the CAISO has devoted to this initiative. BPA would like to reiterate its support of the implementation of the CAISO’s latest proposed approach that limits the GHG bid quantity of EIM participating resources in order to minimize the identified secondary dispatch issue and eliminates the proposed application of the secondary dispatch emissions rate in the GHG price bid.

BPA appreciates the CAISO’s continued work with the California Air Resource Board (ARB) as the ARB develops a solution to account for the remaining secondary dispatch in its regulatory process. Additionally, BPA would like to reiterate that it believes the appropriateness of any proposed approach to the secondary dispatch issue to day-ahead enhancements needs more discussion in that stakeholder process.

Feel free to contact me if you have questions regarding BPA’s comments.