

**Comments
of the
California Municipal Utilities Association**

**Annual Policy Initiatives Roadmap Process Straw Proposal
July 18, 2017**

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide initial comments on the above-referenced Straw Proposal that seeks to amend the annual policy initiatives Roadmap. CMUA applauds the direction of the CAISO to consider and propose changes to the Roadmap process. This reflects the views of stakeholders expressed last year.

Removal of “Quantitative Matrix”

CMUA supports the CAISO’s removal of the ranking process for discretionary initiatives. While CMUA supported initiation of this process many years ago as the first effort to incorporate stakeholder feedback and understand how the CAISO was allocating scarce resources, that mechanism had outlived its usefulness and become the subject of ridicule within the market participant community. While well intentioned, it had the opposite effect than that intended and precipitated stakeholder attempts to game the ranking. CMUA applauds the CAISO for removing this mechanism.

Three Year Planning Horizon

CMUA agrees that a longer term look ahead will assist both the CAISO and stakeholders to plan for future initiatives. Given the policy and operational challenges facing the Grid, planning farther into the future to allocate CAISO, and consequently, stakeholder resources will assist the entire market to develop an understanding of the direction of market initiatives, allow more time for education and preparation on certain issues, and should lead to better decision-making.

Balancing Process, Efficiency and Stakeholder Input

CMUA agrees with the comments of several stakeholders made at the July 25th Stakeholder Call that there should be express provision for stakeholder comments at several steps in the Roadmap development process. CMUA is leery, however, of a BPM-like mechanism whereby stakeholders must constantly check to see what is proposed, with comment deadlines for each and every proposal. This creates a constantly iterative process that is overly burdensome and ineffective because it does not allow consideration of competing or alternative proposals. Instead, CMUA agrees with other stakeholders that proposals can be grouped together temporally and comments submitted adequately in advance of the catalogue issuance. The CAISO should also allow for an opportunity for comment on the draft catalogues. This will ensure adequate feedback while not creating undue burdens for the CAISO or stakeholders.

Again, CMUA appreciates the direction the CAISO has taken to improve the Roadmap process and looks forward to continued development of this effort.

Tony Braun
Braun Blaising Smith Wynne, P.C.
915 L Street, Suite 1480
Sacramento, CA 95814
(916) 326-4449
braun@braunlegal.com

Counsel to CMUA