

**COMMENTS OF IDAHO POWER COMPANY  
ON CAISO’S 2018  
*EIM Greenhouse Gas Enhancements – 3<sup>rd</sup> Revised Draft Final Proposal***

| Submitted By   | Company             | Date Submitted |
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Idaho Power Company (“Idaho Power”) appreciates the opportunity to provide comments on the California Independent System Operator’s (“CAISO”) *EIM Greenhouse Gas Enhancements – 3<sup>rd</sup> Revised Draft Final Proposal* (“Proposal”) dated April 25, 2018. Idaho Power recognizes the work and thoughtful consideration that went into developing this version of the Proposal and appreciates the considerable efforts of CAISO and the stakeholders.

Based on the information available to stakeholders in the CAISO’s stakeholder process, Idaho Power supports the Proposal. Under the Proposal, the greenhouse gas bid quantity for each resource—that is, the amount of generation from that resource that could be attributed to serving load in California—will be limited to the MW value between the base schedule and the resource’s upper economic level. Idaho Power believes this is a reasonable proposal and is an improvement over the current approach, under which the entire transfer, including base schedule, is included in the greenhouse gas bid quantity. The real additional energy that could go into California should be the energy above the base schedule.

Idaho Power again appreciates the opportunity to submit these comments and looks forward to continued collaboration with CAISO on these and other issues.