

**COMMENTS OF IDAHO POWER COMPANY  
ON THE CAISO'S 2018 POLICY INITIATIVE CATALOG**

Submitted by	Company	Date Submitted
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Idaho Power Company (“Idaho Power”) will join the Western Energy Imbalance Market (“Western EIM” or “EIM”) in April 2018. Upon joining, Idaho Power will follow market rules set forth by the market operator, the California Independent System Operator (“CAISO” or “ISO”). Due to its pending participation in the Western EIM, Idaho Power has a direct interest in the policy initiative catalog as the ISO determines initiatives that may ultimately govern operation of the market.

Idaho Power appreciates CAISO’s efforts to continually improve upon its market offerings through its stakeholder processes and the policy initiatives catalog. As part of this process Powerex is submitting a proposal that the CAISO include a “New Default Energy Bid Option for Resources Located Outside of the CAISO Balancing Authority Area” in its 2018 Policy Initiatives Catalog. Idaho Power strongly supports this proposal. As Idaho Power has worked with the Department of Market Monitoring to develop a Default Energy Bid (“DEB”) for its hydro resources, it has become increasingly apparent that the existing framework for DEBs is unworkable for EIM Entities with large hydro portfolios.

Idaho Power supports Powerex's proposal without modification, and supports either adding these concepts to the existing stakeholder process on Commitment Costs and Default Energy Bid Enhancements or, creating a new, high priority stakeholder process to address these issues in early 2018.

Idaho Power appreciates the opportunity to submit these comments and is looking forward to continued collaboration with CAISO as it works toward joining the Western EIM next April.