



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204

**Comments of Portland General Electric Company on  
*EIM Greenhouse Gas Enhancement – Revised Draft Final Proposal (dated 6/23/2017)*  
July 6, 2017**

Portland General Electric Company (“PGE”) appreciates the opportunity to provide comments to the California Independent System Operator (“ISO”) on the *Revised Draft Final EIM Greenhouse Gas Enhancement Proposal* (“Proposal”) dated June 23, 2017. PGE has signed an implementation agreement with CAISO to become the fifth utility outside the State of California to join the Western Energy Imbalance Market (“EIM”) with a scheduled go-live date of October 2017. As such, PGE has a vested interest in the development and implementation of accurate EIM greenhouse gas (“GHG”) accounting methods. In addition to submitting our own comments on the Proposal, PGE supports the Joint Comments of the EIM Entities group.

PGE supports the direction taken by the ISO to address the concerns raised by the California Air Resources Board (“CARB”) in regards accounting for the GHG associated with sub-hourly economy energy imports to California facilitated through the EIM. Specifically, PGE finds that the two-pass model developed by the ISO is the most appropriate solution for CARB’s EIM GHG accounting concerns under the current market design and compliance regime. PGE is encouraged to see that the ISO is aiming to start testing this fall and is targeting a January 2019 go-live, ensuring the “bridge” solution being proposed by CARB is not left in place longer than is necessary.

PGE understands the ISO will allow stakeholders sufficient opportunity to provide feedback during and immediately following the testing phase to ensure the program is performing as expected prior to its final refinement for implementation. PGE believes this stakeholder engagement will help settle any outstanding concerns and galvanize support for the program. For example, at this time PGE conceptually supports the ISO’s method to identify and account for certain “California supply” obligations outside the EIM; however, reviewing the outcome of using this method during testing, and being given the opportunity provide feedback on if it is accurately accounting for transactions made outside the EIM, will allow PGE to express unqualified support for the program’s final implementation.

Further, PGE understands the ISO is continuing to have constructive conversations with CARB on this initiative, and encourages this close interaction to continue during the development and testing phases to help ensure that CARB will fully support this model’s implementation and adjust its programs to fit with the technical capabilities of the modified optimization.

PGE appreciates the opportunity to provide comments to CAISO with regard to the Proposal. For any follow-up communications, please contact Elysia Treanor at (503) 464-8528 or at [Elysia.Treanor@pgn.com](mailto:Elysia.Treanor@pgn.com) or Dan Williams as (503) 464-7399 or at [Dan.Williams@pgn.com](mailto:Dan.Williams@pgn.com).