



Portland General Electric Company
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PGE Comments on CAISO Draft 2017 Stakeholder Initiatives Catalog

Portland General Electric Company (PGE) appreciates the opportunity to provide input to the California Independent System Operator (CAISO) on its draft 2017 Stakeholder Initiatives Catalog. PGE requests the following clarifications and looks forward to continued stakeholder dialogue prior to the CAISO publishing the final 2017 Stakeholder Catalog Roadmap.

Clarification on Identification of Initiatives Affecting the Energy Imbalance Market (EIM):

PGE appreciates that CAISO recognizes the unique needs of the EIM as a growing stand-alone market within the prioritization process. PGE supports the CAISO's decision to develop an "EIM" code for initiatives that affect the EIM. Additionally, PGE appreciates that CAISO considers these classifications as "preliminary" and is willing to take into account stakeholder feedback in the classification process.

PGE requests that CAISO consider whether EIM code is appropriate for the following initiatives, or clarify their rationale for not applying an EIM code to them:

- 7.1 Multi-Stage Generator Bid Cost Recovery
- 7.2 Extended Pricing Mechanisms
- 9.1 Real-Time Market Enhancements
- 9.2 Hourly Bid Cost Recovery Reform
- 11.6 Flexible Ramping Product Enhancements

PGE also requests additional clarification on the scope of the following initiatives in order to determine whether it is appropriate to apply an EIM code:

- 5.15 Full Network Model Enhancements – Phase 2
- 11.5 Multi-Stage Generator Regulation Refinements

PGE understands that the identification process will continue to be refined, and we look forward to working with the CAISO and the EIM Governing Body to develop the guidance document providing detail on how EIM-specific initiatives are classified.

Clarification on Initiatives in the Catalog:

BCR Self Schedule Allocation and Bid Floor Initiative

PGE requests CAISO update item 4.11, "BCR Self Schedule Allocation and Bid Floor initiative", in the catalog to reflect the removal of the energy Bid Floor enhancement from the draft final Self-Schedules Bid Cost Recovery Allocation and Bid Floor initiative proposal, and



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insert the following new initiative to carry forward the energy Bid Floor enhancement work undertaken in 2016:

- **7.7 Energy Bid Floor Modification:** This initiative would evaluate a modification of the energy bid floor (currently -\$150) to allow the CAISO and market participants to address the market's need for decremental energy more efficiently.

Real Time Market Enhancements

In addition to the request above regarding this initiative, PGE requests CAISO clarify whether the scope of 9.1 Real-Time Market Enhancements will include consideration of the alignment of scheduling and dispatch between the CAISO Fifteen Minute Market, EIM, and bilateral markets.