



EIM GHG Enhancements 3rd Revised Draft Final Proposal

**Public Generating Pool Comments
May 16, 2018**

Public Generating Pool (PGP) appreciates the opportunity to comment on the California ISO's Regional and EIM GHG 3rd Revised Draft Final Proposal. PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 95% of which is carbon-free. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA.

PGP members are not currently participants in the EIM. However, BPA and other BAAs continue to evaluate the costs and benefits of EIM participation. For PGP, a key consideration for ISO and EIM market participation is evaluation of the role that market rules play in proper price formation and equitable treatment of resources both within the market footprint and outside the footprint.

PGP reiterates its support for:

- Limiting the GHG bid quantity of EIM participating resources to the MW value between the EIM participating resource's base schedule and the resource's upper economic level.
- Elimination of the minimum bid price from the proposal.
- Further discussion of the extension of GHG tracking and attribution to the day-ahead market in the CAISO's stakeholder initiative examining extension of the day-ahead market to EIM entities.

PGP thanks the CAISO for its responsiveness to stakeholder feedback in making the above changes in its 3rd Revised Draft Final Proposal.

Comments submitted by:

Laura Trolese, ltrolese@publicgeneratingpool.com, (360) 513-6465
Therese Hampton, thampton@publicgeneratingpool.com, (360) 852-7366