

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide written comments on the Clean Energy and Pollution Reduction Act Senate Bill 350 Study initiative posted on February 4, 2016.

Please submit comments to regionalintegration@caiso.com by close of business
February 19, 2016

Materials related to this study are available on the ISO website at:

<http://www.caiso.com/informed/Pages/RegionalEnergyMarket/BenefitsofaRegionalEnergyMarket.aspx>

Please use the following template to comment on the key topics addressed in the initiative proposal.

12. The regional market benefits will be assessed based assuming a regional market footprint comprised of the U.S. portion of the Western Interconnection. Do you believe this is a reasonable assumption for the purpose of this study? If not, please explain.

Comment: No. While the combination of the Business as Usual (BAU) case and the Interconnection-wide market will give a high bookend for the potential benefits, it does not give a lower bookend on the benefits. Peak recommends that the study also consider a case with smaller participation, such as PacifiCorp only, PacifiCorp and NV Energy, or EIM participants. Also, the hurdle rates used in the BAU case will be an important factor in the ultimate benefit demonstrated, and it should be clear how the hurdle rates were developed and tuned.

17. Other

Comment: It is unclear how the Reliability impacts are going to be identified and measured. Peak looks forward to understanding this aspect and would welcome opportunities to discuss this further.