

## Stakeholder Comments

Submitted by	Company	Date Submitted
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Seattle City Light (City Light) is the tenth largest consumer owned electric utility in the nation; providing electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. City Light owns and operates resources with approximately 2,000 MW of flexible, fast-ramping, hydroelectric capacity. We regularly transact in the wholesale energy and transmission markets. City Light executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Energy Imbalance Market (EIM) in April 2020.

City Light thanks CAISO for the opportunity to provide comments on the Day Ahead Market Enhancements initiative and looks forward to working with all stakeholders throughout this process.

### General Comments:

Seattle continues to support this initiative's scope that includes moving to a fifteen-minute day-ahead market, combining the IFM and RUC, and creating a day ahead imbalance reserve product.

Seattle is interested in learning more details about the design, mechanics, and quantity of the sub-regional imbalance reserve requirement and encourages CAISO to expand on this element in its next draft.

Seattle supports a performance evaluation, as well as a no-pay provision, to ensure that imbalance reserve awards show up in real-time. Seattle supports the exploration of other, additional mechanisms to ensure that imbalance reserve awards perform as instructed in real-time. Stakeholders suggested payment claw-back and disqualification provisions; and, for intertie awards, a day-ahead tagging or resource identification requirement. Seattle supports exploration of these mechanisms in addition to those proposed by CAISO in the straw proposal.

Seattle supports modifications of the EIM real-time resource sufficiency (RS) test to freeze transfers to 15-minute intervals where the test fails as opposed to the entire hour. As the EIM day ahead RS requirements are considered in a subsequent stakeholder process, the EIM real-time RS requirements will require further refinements as well.

Seattle also supports the re-classification of this initiative to hybrid non-EIM specific as the proposal includes changes to EIM-specific rules of the real-time market.

Seattle thanks CAISO for the opportunity to provide these comments and looks forward to reviewing more details on this proposal in the future.