

**Comments on CAISO's
Draft 2013 Stakeholder Initiatives Catalog Revised Jan. 28, 2014**

February 12, 2014

On January 28, 2014, CAISO posted a revision to the Draft 2013 Stakeholder Initiatives Catalog followed by a web conference on February 5, 2014. California Department of Water Resources State Water Project (SWP) appreciates the opportunity to provide comments.

The purpose of the recurring Stakeholder Initiatives Catalog stakeholder process is to provide stakeholders a list of all ongoing and potential enhancements to the CAISO's market design and infrastructure planning process while gathering input from stakeholders to prioritize discretionary initiatives. Through several rounds of comments and catalog revisions, the CAISO creates a priority list of discretionary initiatives based on stakeholder input. Unfortunately, despite significant stakeholder input, many discretionary initiatives are left unpursued. Often, this is because CAISO dedicates significant resources to initiatives that are assigned a "non-discretionary" status. For example, the recent Draft 2013 Catalog includes a newly introduced initiative to perform a study related to the Energy Imbalance Market (Section 13.1). This initiative has been assigned a non-discretionary status, because the CAISO committed to the Board of Governors in November 2013 that it would perform such a study. In contrast, the initiative to study a voltage support mechanism was only assigned a discretionary status, to be completed if time permits. The result is that the CAISO's policy roadmap often reflects CAISO priorities instead of stakeholder priorities.

SWP requests that the ISO consider the input by stakeholders more appropriately in this planning process, start the process earlier so a yearly catalog is in place by the first month of the year, and provide a cross-reference to the budgeting process, as shown in CAISO's annual Budget and Grid Management Charge Rates document, for each initiative once adopted or in progress.