

## Southwestern Power Group Comments on Market Design Initiatives Catalog

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Southwestern Power Group (SWPG) appreciates the opportunity to submit comments to as part of the CAISO's Market Design Catalog Initiative stakeholder process. The Southwestern Power Group is an Independent developer of utility-scale generation and transmission in the Desert Southwest.

SWPG is developing a Double-circuit 500 kV interstate transmission project between central New Mexico and Metro-Phoenix. The purpose of the project is to deliver primarily renewable energy from NM and AZ to western markets (at the Palo Verde hub).

### **SWPG supports several of the long-term CRR initiatives noted by the ISO**

SWPG supports several of the Long-term CRR initiatives. Recognizing, however, that there are many important non-CRR related market design change initiatives that are also critical we have not completed a detailed template at this time. SWPG asks the ISO to consider allowing stakeholders to rank the CRR initiatives separate from other market design initiatives, recognizing that in at least some cases the CRR initiatives would call upon different resources at the ISO than many of the other market design initiatives. This would be akin to the ISO's policy of allowing stakeholders to rank infrastructure initiatives separate from other market design initiatives.

Should the ISO be willing to consider a separating ranking for the CRR initiatives, SWPG would be pleased to complete a detailed stakeholder template.

Thank you for your consideration.