

September 27, 2017

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON PROPOSED TOPICS FOR THE
2018 STAKEHOLDER INITIATIVES CATALOG**

In response to CAISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide the following comments on the proposed topics for the 2018 Stakeholder Initiatives Catalog submitted by other stakeholders on or before September 15, 2017:

The topics for initiatives proposed by all stakeholders in this initial round of the 2018 Stakeholder Initiatives Catalog process generally seem to be appropriate subjects for CAISO review and analysis. The Six Cities therefore do not oppose consideration of any of the topics for stakeholder initiatives submitted on or before the September 15th first round deadline. Of course, the Cities subsequently may express disagreement with substantive proposals that may be considered as part of such initiatives.

The Six Cities submit two general comments regarding the appropriate scope and prioritization of proposed initiatives and a specific comment on a process proposal by Powerex.

- 1) In general, the scope of initiatives that involve consideration of changes to bidding options, scheduling, commitment parameters, or reliability requirements should not be limited to particular types of resources or a sub-set of BAAs that participate in the EIM. Although the needs of a particular type of resource or particular EIM area may give rise to a proposed initiative, any resulting market design changes should be applicable or available to all similarly-situated market participants.
- 2) In establishing the priorities for the timing of proposed initiatives, CAISO should seek to maximize the potential for improvements in market performance and efficiency for as broad a portion of the markets as possible.
- 3) With respect to consideration of a new Default Energy Bid option as proposed by Powerex, any consideration of that topic as part of the on-going Commitment Cost and Default Energy Bid Enhancement initiative, as requested by Powerex and Idaho Power, should occur in a second phase of that initiative and should not delay prompt

implementation of modifications to allow reference level updates and adjustments and hourly submission of commitment cost bids.

Submitted by,

Bonnie S. Blair
Thompson Coburn LLP
1909 K Street N.W., Suite 600
Washington, D.C. 20006-1167
bblair@thompsoncoburn.com
202-585-6905

Attorney for the Cities of Anaheim, Azusa,
Banning, Colton, Pasadena, and Riverside,
California