



Department of Energy

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Bonneville Power Administration
P.O. Box 3621
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**CAISO Annual Policy Initiatives Roadmap Process
Comments on 2020 Draft Policy Initiatives Roadmap
Submitted by Bonneville Power Administration, October 24, 2019**

| Submitted by | Company | Date Submitted |
|---|---------------------------------|------------------|
| Mark Symonds Business Transformation Office mcsymonds@bpa.gov | Bonneville Power Administration | October 24, 2019 |

Bonneville Power Administration¹ appreciates this opportunity to comment on CAISO’s 2020 Draft Policy Initiatives Roadmap. Bonneville is generally supportive of the primary drivers for and the logical sequence of critically important and far-reaching policy initiatives reflected in this draft roadmap. Bonneville is particularly encouraged by the manner in which the CAISO is handling the integration of the proposed Extension of the Day-Ahead Market to EIM Entities, with important changes contemplated through the Day-Ahead Market Enhancements and Resource Adequacy Enhancements policy initiatives.

Bonneville also seeks greater clarity in the next version of the 2020 roadmap regarding the scope and timing of the proposed dispatch enhancements. While system market power is an important issue, Bonneville encourages the CAISO to consider assigning a lower priority to the System Market Power policy initiative to help accommodate a more accelerated timeline and a scope of dispatch enhancements that addresses EIM market closing timelines and EIM-related resource sufficiency refinements.

¹ Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500 MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and then other regional entities prior to selling power out of the region.

1) Energy Imbalance Market closing timelines and Resource Sufficiency²

Bonneville requests that the CAISO clarify which specific policy initiatives included in the Final Policy Initiatives Catalog are encompassed by the new Dispatch Enhancements initiative. Bonneville has previously supported the CAISO's revisions to the scope of the discretionary initiatives 7.1.10 EIM Base Schedule Submission Deadline and 7.1.24 Real-Time Market and EIM Refinements to address the scope proposed by Bonneville.³ Bonneville also supported the timing indicated by moving 6.13 Real-Time Market and EIM Refinements into the Underway and Planned section of the Catalog. Once Bonneville better understands the composition of this new initiative, we will be better positioned to comment on its sequence and timing, as we had previously sought an implementation timeline in the Fall of 2020 or 2021 for the scope discussed herein.

2) Resource Sufficiency – obligation transfers⁴

Bonneville continues to support the CAISO's continued inclusion of the initiative 6.7.3 Transferring Bid Range as a component of planned initiative 6.7 Extend Day-Ahead to EIM Entities and supports the timing of the initiative.

3) Settlements – increased transparency⁵

Bonneville seeks clarity on the CAISO's refinement of the scope and timing of the underway and planned initiative 6.13 Real-Time Market and EIM Refinements and the Real-Time Settlement Review planned for 2020 that is incorporated in the 2020 roadmap in order to address the increased transparency proposed by Bonneville.⁶

4) Settlements – dispute resolution timelines⁷

Bonneville expects that this policy initiative will be completed in 2019.

² This first proposal addresses provisions of the Bonneville and CAISO Implementation Agreement, section 14(g), 14(h)(i) and 14(h)(iii).

³ Comments Submitted July 2, 2019, Bonneville Power Administration, pages 1-3.

⁴ This second proposal addresses provisions of the Bonneville and CAISO Implementation Agreement, section 14(h)(ii).

⁵ This third proposal addresses provisions of the Bonneville and CAISO Implementation Agreement, section 14(h)(iiii).

⁶ Comments Submitted July 2, 2019, Bonneville Power Administration, page 4.

⁷ This fourth proposal also addresses provisions of the Bonneville and CAISO Implementation Agreement, section 14(h)(iiii).