



Summary of Stakeholder Comments

Revised Draft 2020 Policy Initiatives Catalog

This comments matrix includes the CAISO’s responses to stakeholder comments applicable to the Revised Draft 2020 Policy Initiatives Catalog. The CAISO will consider comments regarding the 2020 Annual Policy Initiatives Roadmap as it develops the Draft 2020 Policy Initiatives Annual Plan and Roadmap.

Stakeholder	Comment	CAISO Response
First Solar, Inc.	“We also appreciate CAISO’s response to the energy-only initiative suggestion and agree that elements of the energy-only issue are being examined in some fashion in a number of initiatives and proceedings at the CAISO and CPUC. We remain concerned, however, that the topic of energy-only projects and how they fit into the plan for California’s renewable fleet in a way that supports their commercial viability if California is going to count them to support GHG reduction policies, is not being examined holistically. We urge CAISO to continue to consider how it might tee up a comprehensive examination of energy-only issues.”	The CAISO understands the importance of energy-only resources and their participation in the CAISO markets. Discussions on this topic are better suited in the CPUC’s Resource Adequacy Proceeding and Integrated Resource Plan process. The CAISO is also actively participating in these discussions.
Powerex Corp.	“Powerex notes that Item 5.6 - Real-Time Market Neutrality Settlement is listed as a discretionary item and as recently completed in the Catalog. However, the CAISO has committed to stakeholders, as well in the CAISO’s tariff amendment filing to the Federal	Items in Section 4 of the catalog reflect completed initiatives that have 1) finished a stakeholder process and 2) were approved by the Board of Governors. The Real-Time Market Neutrality Settlement initiative is correctly



	<p>Energy Regulatory Commission, that it will “engage stakeholders to discuss a more comprehensive review of neutrality offsets, and to ensure market confidence in CAISO settlement processes.”¹ Therefore, Powerex suggests the CAISO reconsider the discretionary categorization of this initiative and to remove it from the completed section of the Catalog.”</p>	<p>labeled because the stakeholder process for that effort has finished and policy was approved by the CAISO Board of Governors on July 24, 2019.</p> <p>The CAISO did state in their tariff amendment filing to the Federal Energy Regulatory Commission for Real-Time Market Neutrality Settlement that the CAISO would conduct a comprehensive review of neutrality offsets. The revised scope of Real-Time Market and EIM Refinements reflects the CAISO’s statements in the tariff amendment filing. Additionally, the catalog has been revised to reflect this commitment.</p>
Powerex Corp.	<p>“Powerex notes that the CAISO and the EIM Entities are engaged in an EDAM feasibility assessment to evaluate the benefits and feasibility of a broader regional EDAM. In order to be successful, the design and development of an EDAM must be a broad regional collaborative effort. As a practical matter, this will require taking a fresh look at market design in order to balance and take into account the diverse interests of all of the potential EDAM participants across the West. The EDAM cannot, and should not, be simply an extension of the existing Energy Imbalance Market or the CAISO’s existing Integrated Forward Market. Instead, any effort to pursue the development of an EDAM will necessarily encompass a range of market design</p>	<p>The CAISO reviews all descriptions in the Policy Initiatives Catalog before each update. After the completion of the feasibility assessment, the CAISO will accordingly revise the description of item, Extend Day-Ahead Market to EIM Entities as necessary.</p>



	<p>issues (e.g. day-ahead market enhancements, resource adequacy and sufficiency, governance etc...). As such, depending on the outcome of the EDAM feasibility assessment, and in the event there is sufficient stakeholder support to move forward with a formal EDAM stakeholder process, Powerex believes that the Catalog and the CAISO's Policy Initiatives Annual Plan will need to be substantially reconsidered and reevaluated with respect to implementing an EDAM policy design framework. ”</p>	
Public Generating Pool	<p>“In the 2020 Revised Draft Policy Initiatives Catalog, CAISO states that it will need to extend the GHG attribution approach from the EIM to the extended day ahead market. However, in its presentation provided at the June 18, 2019 Regional Issues Forum, the California Air Resources Board (CARB) stated that “Expansion of the day-ahead market and regionalization will require different [GHG attribution] approaches and additional coordination.” CAISO has also stated in public forums that the current GHG Attribution Approach used for the EIM is not workable for an extended day ahead market. PGP requests CAISO modify the description of this initiative to make clear that CAISO is not simply extending the current EIM GHG Attribution Approach to an extended day-ahead market. But rather that CAISO will need to develop a new GHG attribution approach for the extended day ahead market that may also be applied to the EIM.</p>	<p>The CAISO has revised the catalog description of Greenhouse Gas (GHG) Attribution Approach for Day-Ahead (D, 2).</p>



Public Generating Pool	<p>“7.1.24 Real-Time Market and EIM Refinements In its presentation to the EIM Governing Body on June 28, 2019 regarding the decision on the Real-Time Market Neutrality Proposal, CAISO stated that it would include a comprehensive review of offset and uplifts within the scope of real-time market enhancements scheduled for next year. Yet the Real-Time Market and EIM Refinements initiative is categorized as “Discretionary” in CAISO’s Catalog. Given the errors addressed in the Real-time Market Neutrality Settlements initiative, PGP believes it is imperative that the comprehensive review of offset and uplifts is prioritized in CAISO’s 2020 Roadmap of initiatives. Given the commitment to additional review to assure the changes have achieved the desired effect, PGP requests that this item be categorized as “Currently Underway and Planned.”</p>	<p>The CAISO has moved item Real-Time Market and EIM Refinements to Section 5, Currently Planned and Underway and updated the item’s categorization.</p>
Public Power Council	<p>“Currently, the initiatives associated with EDAM are classified under the EIM Governing Body’s advisory authority. While specific considerations may need to be made for individual initiatives, generally these initiatives should be under the EIM Governing Body’s primary authority.”</p>	<p>The catalog correctly captures the EIM Governing Body’s decisional authority for all items listed under Extend Day-Ahead Market to EIM Entities. The EIM Governing Body’s policy guidance document also aligns the categorization of the EIM Governing Body’s role for this initiative. However, the CAISO has committed to a new initiative to review the EIM governance structure. Any changes to the governance structure will be reflected in future categorizations of policy initiatives.</p>



Public Power Council	Greenhouse Gas Attribution Approach for Day Ahead – “As currently described, this initiative would simply extend the current EIM GHG attribution rules to the day ahead. PPC has serious concerns about whether the current EIM GHG attribution rules would be workable in a day ahead market. The initiative should be revised to clarify that it will explore options for GHG attribution rules in the Day Ahead Market.”	The CAISO has revised the description of item Greenhouse Gas (GHG) Attribution Approach for Day-Ahead (D, 2).
Public Power Council	Extend Day-Ahead Market to EIM Entities - “Currently, the initiatives associated with EDAM are classified under the EIM Governing Body’s advisory authority. While specific considerations may need to be made for individual initiatives, generally these initiatives should be under the EIM Governing Body’s primary authority”	The catalog correctly captures the EIM Governing Body’s decisional authority for Extend Day-Ahead Market to EIM Entities. The EIM Governing Body’s policy guidance document also aligns the categorization of the EIM Governing Body’s role for this initiative. However, the CAISO has committed to a new initiative to review the EIM governance structure. Any changes to the governance structure will be reflected in future categorizations of policy initiatives.
Seattle City Light	“Seattle also reiterates the recommendation made in our March 2019 comments on the 2020 Policy Initiatives catalog that EDAM be classified under the primary authority of the EIM Governing Body.”	The catalog correctly captures the EIM Governing Body’s decisional authority for Extend Day-Ahead Market to EIM Entities. The EIM Governing Body’s policy guidance document also aligns the categorization of the EIM Governing Body’s role for this initiative. However, the CAISO has committed to a new initiative to review the EIM governance structure. Any changes to the governance structure will be reflected in future



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		categorizations of policy initiatives.
Seattle City Light	“The Real-Time Market Neutrality Settlement initiative implemented solutions to address settlement cost causation concerns, however, Seattle and other stakeholders encouraged CAISO to explore these issues in more depth in a future initiative. We are pleased to see this captured in the Real-Time Market and EIM Refinements initiative. Seattle recommends that additional scope also be added to the Multi GHG Area Initiative...”	The CAISO has revised the description of Greenhouse Gas (GHG) Attribution Approach for Day-Ahead (D, 2).
“The Suppliers” Large-scale Solar Association (LSA), EDF-Renewables (EDF-R), and SPower	Interconnection Process Enhancements “Include this item in Section 6 of the Catalog (“Initiatives Currently Underway and Planned”) instead of Section 7”	The CAISO has moved item 2020 Interconnection Process Enhancements to Section 5, Currently Planned and Underway.