

**Portland General Electric Comments
Comments on Reliability Coordinator Rate Design, Terms and Conditions Draft Final
Proposal**

Submitted by Sarah Edmonds, sarah.edmonds@pgn.com

July 11, 2018

RELIABILITY COORDINATOR SCOPE OF SERVICES

PGE supports the CAISO's efforts to facilitate the continuation of the Western Interchange Tool (WIT) and the Enhanced Curtailment Calculator (ECC). We are confident that the CAISO will work with the other RCs to ensure that these tools continue to provide benefit to the Western Interconnection under a framework of equitable cost sharing. PGE agrees that the costs for these tools should be included in the core RC services rate based upon the scope of the CAISO RC service area.

RELIABILITY COORDINATOR OVERSIGHT

PGE supports CAISO's proposal for an oversight committee to hold at least one public meeting per year that will focus on any matters regarding the CAISO's performance of the RC function, with broad inclusion of and coordination with stakeholders, including the Western Interconnection Regional Advisory Board (WIRAB).

RELIABILITY COORDINATOR SERVICE AGREEMENTS

PGE appreciates the additional information the CAISO has provided relating to the Reliability Coordinator Services Agreement as well as the draft *pro forma* agreement which was posted to the CAISO website on May 31, 2018 as part of the CAISO responses to comments. PGE has not had sufficient time to review the agreement in order to provide meaningful comments and requests that CAISO allow for additional time in this regard.

PGE supports the initial 18 month term followed by the 12 month notice requirement.

RELIABILITY COORDINATOR ONBOARDING

PGE appreciates the clarifications CAISO has provided relating to how staggered network model integration will work as part of the set-up required for multiple RC Customers for a single start date in the fall of 2019. For future years, the CAISO proposes to onboard RC Customers once a year in April. PGE understands CAISO has resource and timing constraints necessitating this restriction, but urges CAISO to be as flexible as possible in negotiating onboarding dates with RC Customers. For example, currently in the western Interconnection, multiple BAAs have signaled a Peak RC exit date of December 31, 2019; leaving open the question of whether these

entities must elect to onboard with CAISO *earlier* or *later* (including how to address the RC services gap period between January 2020 and April 2020).

RELIABILITY COORDINATOR FUNDING REQUIREMENT AND RATE DESIGN

PGE supports the CAISO's revised proposal to invoice RC Customers annually on January 1st for RC services provided that calendar year.

PGE also supports CAISO's revised proposal to continue to perform all RC services to ensure reliability of CAISO RC area including the area in of any RC Customer who is in default.