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**VIA EMAIL**

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**Public Power Council's Comments on the  
Consolidated EIM Initiatives from 2017 Roadmap Straw Proposal  
Dated July 31, 2017**

Public Power Council (PPC) appreciates the opportunity to comment on the Straw Proposal for this initiative and the ISO's efforts to move these issues forward. PPC is a non-profit trade association that represents the common interests of approximately 100 consumer-owned electric utilities in the Pacific Northwest that are preference power customers of the Bonneville Power Administration (BPA). Many of PPC's members are located within the EIM footprint in Puget Sound Energy's balancing authority area (BAA) and PacifiCorp's east and west BAAs.<sup>1</sup>

PPC's interest here is in ensuring that our members' delivered power costs are not increased and that they have fair access to the ISO markets to the extent they choose to participate. To that end, we provide comments on two issues: changes to bilateral scheduling timelines and net wheeling compensation.

**Bilateral Schedules**

PPC supports consideration of proposals to change the market timelines for bilateral schedule submission. Changes should apply to all bilateral schedules regardless of where the source or sink. The current timelines affect hedging for all loads in an EIME BAA but only the EIME has the ability to hedge for its loads. This situation is not equitable and all should have that ability to the extent feasible and efficient. The movement of timelines is a good first step. Requiring EIMs to share the offset with customers that help congestion and to move their units when possible on the same basis as they do for the EIME's merchant's load is an essential element of the reforms.

**Net Wheeling Compensation**

PPC prefers the ISO's first option. A hurdle rate may distort the market, which is undesirable. The issue is the distribution of benefits among EIMs, and the resolution should focus on an

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<sup>1</sup> PPC members are also located in or take deliveries through Portland General Electric and Idaho Power Co., which have declared their intentions to join the EIM in the next few years.

allocation of benefits to EIMs for net wheeling on transmission that is donated and not already “paid for” by other EIM benefits. It is important not to impose additional charges on non-EIME loads. Those loads did not voluntarily join the market and may not be trading in it; they are already paying for the transmission system through their network and PTP rates.