

PUGET SOUND ENERGY COMMENTS
CONSOLIDATED ENERGY IMBALANCE MARKET INITIATIVES- DRAFT TARIFF LANGUAGE
NOVEMBER 22, 2017

Puget Sound Energy (PSE) appreciates the opportunity to provide the following comments on the California Independent System Operator's (CAISO) draft tariff language on the Consolidate EIM Initiatives.

COMMENTS

CAISO Should Revise Draft Section 29.11(q) ("EIM Transfer System Resource Settlement Information") to Reflect that CAISO Will Settle Energy Transfer Schedule Changes From EIM Entities' Base Schedules Between EIM Entity Balancing Authority Areas (BAA).

In its draft revisions dated November 3, 2017, CAISO proposes to provide EIM Entities, under specified conditions, "non-binding Settlement information associated with Energy transfer schedule changes from their respective base schedules between EIM Balancing Authorities..." (Draft Tariff Section 29.11(q)). While PSE appreciates this effort to facilitate the settlement of schedule changes between EIM Entity BAAs, PSE believes that it would be a small incremental step for CAISO to actually perform the settlement if both EIM Entities on the ETSR agree to have CAISO perform this function. This approach would be beneficial for the EIM Entities by reducing the administrative burden of settlement, and should represent a minimal commitment of resources for the CAISO since it already has the information needed for settlement. Moreover, CAISO staff has represented that the CAISO would be willing to settle these transactions so long as the settling entities agreed to have CAISO perform this function.

For the reasons set forth above, PSE believes that CAISO should revise draft Section 29.11 (q) to reflect that CAISO will settle energy transfer schedule changes from EIM Entities' base schedules between EIM Entity BAAs.