



May 16, 2018

AWEA CALIFORNIA CAUCUS (ACC) COMMENTS ON THE CAISO'S EIM GHG ENHANCEMENTS THIRD REVISED DRAFT FINAL PROPOSAL

The AWEA California Caucus (ACC) appreciates the opportunity to offer comments on the California Independent System Operator's (CAISO or ISO) Third Revised Draft Final Proposal in the EIM Greenhouse Gas Enhancements Initiative.

ACC continues to engage on GHG accounting in various California venues. In the CAISO's EIM GHG Enhancements Initiative, ACC originally supported the two-pass solution, but has continued to evaluate other options since the two-pass solution was deemed problematic. ACC had significant concerns about the CAISO's Second Revised Draft Final Proposal in this initiative. In particular, ACC was concerned about the inclusion of what effectively amounted to a GHG hurdle, which would have only applied to clean EIM resources, outside of the CAISO footprint.

ACC appreciates that the CAISO has removed the application of the hurdle rate in the Third Revised Draft Final Proposal. ACC supports the CAISO's current proposal in the Third Revised Draft Final Proposal to limit EIM Participating Resources' GHG bid quantity in order to minimize the occurrence of "secondary dispatch."

ACC looks forward to continuing to work with CAISO and other agencies to properly address GHG accounting. Additionally, ACC looks forward to working with the CAISO to determine how to properly minimize secondary dispatch in the Day-Ahead EIM.