

Comments of Arizona Public Service  
2018 Draft Policy Initiatives Catalog  
Draft Proposal dated November 8, 2017

Arizona Public Service (APS) appreciates the opportunity to provide comments on California Independent System Operators (CAISO) 2018 Draft Policy Initiatives Catalog dated November 8, 2017.

APS recognizes that the volume of stakeholder policy initiative proposals can exceed CAISO's resources and the complexity involved in planning the policy roadmap. APS has identified initiatives from the 2018 Draft Policy Initiatives Catalog that APS believes would be most beneficial in regards to enhancements for the Western EIM. APS would like to request in CAISO's roadmap planning process to consider the prioritization of the initiatives identified below.

2018 Policy Initiative Roadmap priority requests:

**6.1.2 Hourly EIM Resource Sufficiency Evaluation**

The initiative 6.1.13 Flexible Ramping Product enhancements could potentially be combined with as they are related.

**6.1.4 Over/Under Scheduling Load Enhancements**

Initiative 6.1.23 Over/Under Scheduling Load Enhancements is a duplicate proposal to 6.1.4

**6.1.6 Generator Modeling Enhancements**

**6.1.8 Real-Time Market Enhancements**

**6.1.1 EIM Default Energy Bid Option**

**6.1.8 15-Minute Day Ahead Scheduling Granularity**

APS appreciates the ISO's consideration of these comments.