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The Center for Energy Efficiency and Renewable Technologies (CEERT) and Renewable Northwest (RNW) appreciate the opportunity to comment on the California Independent System Operator (CAISO) Policy Initiatives Catalog. As the resources and needs of the grid evolve, it's clear that the policies and operations of the CAISO must also evolve in order to most efficiently and reliably support California's climate and energy goals. In the CAISO Discussion Paper "Electricity 2030: Trends and Tasks for the Coming Years", the CAISO Board and Management articulated the big picture questions faced as the CAISO footprint decarbonizes. It's important that the development and selection of near-term initiatives be guided by these big picture trends and tasks. CEERT and RNW voice strong support for the CAISO undertaking the following initiatives in the coming year in order to most effectively utilize the low-carbon technologies needed for the low-carbon grid.

In the "Energy and Ancillary Services Markets" category, CEERT and RNW are supportive of the following initiatives:

- Multi-Day Unit Commitment
- Day-Ahead Flexible Reserve Product
- Storage as a Transmission Facility
- Export Charges

Each of these initiatives address enhancing the flexibility of the grid through either better enabling clean resources to participate in CAISO markets or increasing the fluidity between CAISO and other balancing authorities in the West.

CEERT and RNW are also supportive of a holistic reevaluation of the Resource Adequacy policies in coordination with the California Public Utilities Commission (CPUC). CEERT has submitted comments on the Order Issuing Rulemaking of CPUC proceeding R.17-09-020 strongly advocating for this reevaluation. Nearly all parties, including the CAISO, also supported reforms to Resource Adequacy. In order to effectively reform Resource Adequacy in a timely manner, it is essential that the CAISO be acting in step with the CPUC both in proceeding R.17-09-020 and through initiatives at the CAISO.