

Chelan County Public Utility District's Comments on the 2018 Final Policy Initiatives Catalog and Draft Roadmap

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Submit comments to InitiativeComments@CAISO.com

Chelan PUD, a consumer-owned utility in Washington, is an active participant in the bilateral, wholesale power markets in the west and a NERC-registered balancing authority. Chelan PUD appreciates the opportunity to provide comments on CAISO's 2018 Policy Initiatives Catalog and Draft Roadmap.

Chelan acknowledges that the CAISO has a difficult task in prioritizing the scarce resources it has to improve market design. However, there is a key omission in the Stakeholder Initiatives Roadmap.

Chelan would like to reiterate the importance of an alternative calculation for EIM Default Energy Bids (DEBs). Numerous stakeholders including Chelan requested that this be a high priority in 2018. Energy limited hydro resources have opportunity costs that are complicated to model and calculate. A DEB method that does not disincentivize hydro participation needs to be examined. Chelan requests that the ISO make an alternative calculation for EIM Default Energy Bids (DEBs) a priority and add this issue to the 2018 Stakeholder Initiatives Roadmap.

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