

Comments on Draft Final - 2017 Policy Initiatives Roadmap
Department of Market Monitoring
January 9, 2017

The Department of Market Monitoring appreciates the opportunity to comment on the Draft Final – 2017 Policy Initiatives Roadmap.

As described in DMM’s comments on the Revised Draft 2017 Stakeholder Initiatives Catalog and Policy Initiatives Roadmap, DMM believes that the Congestion Revenue Rights Auction Efficiency initiative will be a low cost way to achieve significant highly quantifiable benefits relative to the other ranked initiatives.¹ Therefore, DMM strongly supports the ISO’s decision to start this initiative in 2017.

Each year, unanticipated high priority issues tend to arise that require ISO resources. In some cases, this leads the ISO to defer or scale back other initiatives. Should this occur in 2017, DMM encourages the ISO to consider decreasing the scope of some of its other on-going initiatives before scaling back work on valuable new discretionary initiatives such as the CRR initiative if unexpected resource constraints arise. Many of the ISO’s on-going stakeholder initiatives have higher costs and lower benefits than the CRR initiative.

¹ *Comments on Initial Initiative Ranking of 2017 Policy Initiatives Roadmap*, Department of Market Monitoring, November 21, 2016: http://www.caiso.com/Documents/DMMComments_2017PolicyInitiativesRoadmap.pdf.