

**COMMENTS OF IDAHO POWER COMPANY
ON CAISO'S 2018 POLICY INITIATIVE CATALOG**

Submitted By	Company	Date Submitted
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Idaho Power Company (“Idaho Power”) will join the Western Energy Imbalance Market (“Western EIM” or “EIM”) in April 2018. Upon joining, Idaho Power will follow market rules set forth by the market operator, the California Independent System Operator (“CAISO” or “ISO”). Due to its pending participation in the Western EIM, Idaho Power has a direct interest in the policy initiative catalog as the ISO determines initiatives that may ultimately govern operation of the market.

Idaho Power appreciates CAISO’s efforts to continually improve upon its market offerings through its stakeholder processes and the policy initiatives catalog. Idaho Power appreciates the ISO’s determination to include its submitted initiatives in the 2018 Policy Initiative Catalog, and believes they should be prioritized in the following order: (1) Default Energy Bid Option, (2) Hourly EIM Resource Sufficiency Evaluation, (3) Over/Under Scheduling Load Enhancements, and (4) Limiting EIM Energy Transmission Scheduled Resource Transfers.

As stated in earlier comments and communications to the ISO, Idaho Power strongly supports including and highly prioritizing the Default Energy Bid (“DEB”) Option.

Idaho Power believes that current DEB options do not provide a workable framework for setting a cost for such resources and believes that a common methodology should be developed for resources with opportunity costs such as hydroelectric generation sources. The creation of a common methodology for setting a DEB for resources with opportunity costs will ensure fair and equitable application of principles to all similarly situated market participants.

Idaho Power also supports the inclusion of the Hourly Resource Sufficiency Evaluation, the Over/Under Scheduling Load Enhancements, and Limiting EIM Energy Transmission Scheduled Resource Transfers in order to limit the magnitude of inter-interval changes to transfers of power between balancing areas. Idaho Power appreciates the opportunity to submit these comments and is looking forward to continued collaboration with CAISO as it works toward joining the Western EIM next April.