

COMMENTS OF IDAHO POWER COMPANY ON CAISO'S DRAFT POLICY INITIATIVES CATALOG

Submitted By	Company	Date Submitted
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Idaho Power Company (“Idaho Power”) appreciates the opportunity to comment on the California Independent System Operator’s (“CAISO”) draft Policy Initiatives Catalog, dated August 8, 2018.

CAISO has categorized the “EIM Offer Rules—EIM Resource Sufficiency Evaluation” initiative as “complete.”¹ Idaho Power disagrees that this initiative has been adequately addressed. As stated in its Comments on the July 19, 2018, EIM Offer Rules workshop, Idaho Power believes that a stakeholder initiative should be established to evaluate a broad set of changes to the resource sufficiency tests, particularly the flexible ramping sufficiency test.² That being said, Idaho Power also appreciates and supports CAISO’s willingness to consider some changes to the test, absent a policy initiative.

Idaho Power appreciates CAISO’s work on the draft catalog and supports or does not object to the other items listed in it. Idaho Power looks forward to continued collaboration with CAISO on these and other issues.

¹ CAISO Draft Policy Initiative Catalog, pp. 11-12 (Aug. 8, 2018).

² For example, Idaho Power strongly supports the idea of a tolerance band for the flexible ramping sufficiency test that was proposed in the July 19 workshop. Idaho Power also urges CAISO to consider allowing additional sources of ramping capability to count toward the test’s requirements, and to consider changes to how resources with longer ramp times are counted. See Comments of Idaho Power Company on CAISO’s July 19, 2018, EIM Offer Rules Workshop, pp. 2-4 (Aug. 2, 2018), available at <http://www.caiso.com/Documents/IPCCComments-EIMOfferRulesTechnicalWorkshop-Jul19-2018.pdf>.