

COMMENTS OF IDAHO POWER COMPANY ON CAISO'S 2019 FINAL POLICY ROADMAP

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”) *2019 Three-Year Policy Initiatives Roadmap and Annual Plan* (“Roadmap”) dated November 15, 2018. Idaho Power appreciates CAISO’s work on the Roadmap and generally supports it. Idaho Power looks forward to continued work on initiatives that are currently underway, including Local Market Power Mitigation, Day-Ahead Market Enhancements, and others. Idaho Power also looks forward to working on upcoming initiatives, including Extending the Day-Ahead Market to Energy Imbalance Market Entities and the Market Settlement Timeline Transformation.

The Roadmap indicates that the Market Settlement Timeline Transformation initiative will begin in the first quarter of 2019. Given the timing, Idaho Power offers the following suggestions to CAISO for topics for that initiative:

- Reconsider the need to invoice using the T+3 statement and consider whether invoicing could occur beginning with the T+12 statement instead;
- Consider pushing out the dispute deadline (past the current T+26);
- Consider pushing out the metering penalty timeline (past the current T+48); and
- If the T+3 invoice remains, provide an ability to dispute the T+3 statement.

Idaho Power thanks CAISO for the opportunity to comment and looks forward to continued collaboration on these and other issues.