

Aliso Canyon Gas-Electric Coordination Phase 3 – Draft Tariff Language

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Portland General Electric:

On October 1, 2017, Portland General Electric (PGE) will become the fifth entity to join the Western EIM. At that time, PGE will begin managing its diverse generation and transmission assets according to the rules of the EIM, while also continuing to participate in the ISO's forward markets and retaining its responsibilities as an independent Balancing Authority. As such, PGE has a vested interest in the price-formation, flexible ramping, and reliability policies of the ISO and Western EIM.

Identifying Real-Time Gas Indices for EIM Balancing Authority Areas:

PGE questions whether the Tariff should address the potential need to identify on a case-by-case basis the relevant gas trading hub price index to reference for EIM Entities under specific system conditions, and if so, how that identification will be made.

Generalizing 39.7.1.1.3(d) to Allow for Similar Process in Other Regions:

PGE questions whether the Tariff should be written such that the ISO's ability to increase gas prices for the reasons stated could be applied to any region, not just for the resources receiving gas service from Southern California Gas Company and San Diego Gas & Electric Company. It is highly plausible that similar conditions could arise in other areas within the EIM or the ISO's balancing authority area before November 30, 2018, and it does not seem prudent to constrain the ISO's capability under the Tariff by referencing a specific region.