



Imbalance Conformance Enhancements - Draft Final Proposal

Public Generating Pool Comments

February 20, 2018

Public Generating Pool (PGP) appreciates the opportunity to comment on the California ISO's Imbalance Conformance Enhancements Draft Final Proposal dated January 30, 2018. PGP represents ten consumer-owned utilities in Oregon and Washington that own more than 6,000 MW of generation, over 4,500 MW of which is hydro and 96% of which is carbon-free.

PGP is supportive of the ISO's direction to make improvements to the conformance process. PGP appreciates the ISO's change of focus to address the root cause of coarse adjustments rather than solely focusing on improvements to the imbalance conformance limiter. PGP sees the ISO's commitment to provide more transparency and develop tools that help ensure conformance accuracy and proper dispatch to be a positive step forward.

PGP agrees with the ISO's direction to eliminate the imbalance conformance limiter. While the limiter may reduce the price impact of over-adjustments made by operators, it also, at times, suppresses valid scarcity prices and impacts the overall market clearing price without affecting scheduling and market dispatch. PGP believes the ISO should eliminate the limiter sooner rather than later and requests there be no unnecessary delays to elimination of the limiter.

The ISO has already committed to several work intensive efforts in its 2018 Policy Initiatives Roadmap and PGP is concerned about postponement of the imbalance conformance process and the ultimate elimination of the limiter. As such, PGP requests the ISO provide accountability for the improvements suggested to diminish coarse operator adjustments by including the scope and timeline of those improvements in its transmittal letter to FERC alongside its tariff filing to include the limiter. PGP also requests the ISO commit to providing subsequent filings requesting extensions for any delays that may occur in implementation.

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