Portland General Electric Comments on the CAISO's draft 2018 Policy Initiative Catalog

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PGE appreciates the opportunity to provide feedback on the draft 2018 Policy Initiatives Catalog posted on November 8, 2017, and continues to support the ISO's redesigned Annual Policy Initiative Catalog and Roadmap process.

PGE supports the following stakeholder initiatives as its top priorities for 2018, listed in order of importance.

- 1. Hourly EIM Resource Sufficiency Evaluation
- 2. Market Commitment Process Constraints
- 3. EIM Default Energy Bid Option

Further, PGE supports the following discretionary initiatives in no specific order: Lowering the Bid Floor, RA Enhancements, Day-Ahead Flexible Reserve Product, Flexible Ramping Product Enhancements, Transmission Constraint Transparency, Over/Under Scheduling Load Enhancements, and Limiting EIM Energy Transmission Scheduled Resources Transfers

PGE also continues to support the majority of the ISO's in-progress stakeholder initiatives, including the recently-launched Intertie-Deviation Settlement and Imbalance Conformance Enhancement initiatives. Further, PGE continues to support the Real Time Market Enhancements initiative initially slated for 2017 that was recently reprioritized.

PGE understands that the ISO has increased the staff and resources it is dedicating to tackling the initiatives selected for 2018. PGE expects this will help ensure these initiatives are assessed, and solutions developed and implemented, in a timely fashion, and appreciates the ISO's responsiveness to stakeholder requests on this matter.

PGE looks forward to continuing to work with the ISO and fellow stakeholders when the draft 2018 Initiative Roadmap is released to prioritize for near-term implementation a subset of initiatives that have will most benefit customers by enhancing the efficiency and reliability of the ISO's markets.