

Comments of Powerex Corp. on Revised Draft Tariff Language Respecting the Consolidated Energy Imbalance Market Initiatives

Submitted by	Company	Date Submitted
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Powerex appreciates the opportunity to submit comments on CAISO’s revised draft tariff language implementing the Consolidated Energy Imbalance Market (“EIM”) Initiatives. Powerex strongly supports CAISO’s decision to proceed with development of tariff language prior to submitting the proposed EIM enhancements to the CAISO Board for approval in order to ensure timely implementation of the enhancements developed in this proceeding. Powerex also appreciates CAISO’s responsiveness to the comments that were submitted in response to the initial draft tariff language that CAISO posted as well as CAISO’s decision to give interested parties an additional opportunity to submit comments on the proposed tariff language.

While Powerex supports CAISO moving forward with the draft tariff language, Powerex acknowledges the concerns of some interested parties. CAISO could have taken additional steps to further ensure that CAISO stakeholders, that perhaps were not as involved in the Consolidated EIM Initiatives, received notice that the scope of this proceeding had been expanded to include issues related to non-generator resources. Nonetheless, given CAISO’s explanation that the proposed tariff language does not make substantive changes to the existing non-generator resource construct or policy, Powerex believes that it is appropriate for CAISO to proceed with efforts to seek approval of these proposals from the CAISO Board and, ultimately, the Federal Energy Regulatory Commission.