

Stakeholder Comments Template

Subject: Market Initiatives Roadmap Detailed Ranking Results

Submitted by	Company	Date Submitted
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Powerex appreciates this opportunity to provide these comments on the Market Initiatives Roadmap – Detailed Ranking Results.

Powerex agrees with the CAISO that the following market initiatives on their high ranking:

- (8.3) Rules & Procedures for Applying RA Must Offer Obligations for a Subset of Hours;
- (8.1) Enhancements to Standard RA Capacity Product;
- (2.15) Potential Modifications to Market Rules for Day Ahead Intertie Schedules; and
- (4.6) Make Whole Payments for Accepted Bids Adversely Affected by Price Correction.

Powerex notes that in the CAISO presentation and report on Detailed Ranking Results, the CAISO failed to record Powerex and others support for the high ranking of Potential Modifications to Market Rules for Day Ahead Intertie Schedules.

Powerex is concerned that the CAISO is resurrecting a market initiative for (4.6) Enhanced DEC Market. The CAISO implemented the current DEC bidding rule and BPM based on a stakeholder process in 2008. It appears the CAISO is again proposing a DEC bidding rule - to carry forward the bid from the DA market for awarded schedules to the HASP/RT market - that was opposed by the majority of stakeholders. Powerex believes that due to the shortage of CAISO resources and the relatively short time this rule has been in place without any discernable market inefficiencies, this market initiative should not be highly ranked.