

PUGET SOUND ENERGY COMMENTS
DRAFT 2018 POLICY INITIATIVES CATALOG
NOVEMBER 29, 2017

Puget Sound Energy (PSE) appreciates the opportunity to provide the following comments on the California Independent System Operator's (CAISO) draft Policy Initiatives Catalog.

A. COMMENTS

1. *CAISO Should Prioritize Catalog Items 6.1.2 (Hourly EIM Resource Sufficiency Evaluation) and 6.1.4 (Over/Under Scheduling Load Enhancements) in its 2018 Policy Initiatives Roadmap.*

PSE appreciates CAISO's incorporation of the Hourly EIM Resource Sufficiency Evaluation (Item 6.1.2) and Over/Under Scheduling Load Enhancements (Item 6.1.4) items in the draft Policy Initiatives Catalog. As set forth in the catalog submissions for these items, these initiatives implicate processes that are fundamental to the efficiency and operation of the EIM Market. PSE recognizes that the resource sufficiency policy ensures that EIM balancing areas do not lean on other balancing areas. It's also important for the testing model and rules to be designed and implemented to reflect the BAs actual situation more accurately. Load Forecasts are the basis of EIM Entities' balanced base schedules. PSE believes that improvements to these fundamental EIM processes would improve their effectiveness thereby increasing the efficiency of the EIM overall.

2. *If necessary, CAISO could narrow the scope of Catalog Item 6.1.2 (Hourly EIM Resource Sufficiency Evaluation) to initially focus on the Flexible Ramp Sufficiency Test.*

The Hourly EIM Resource Sufficiency Evaluation item (Item 6.1.2) appears to combine a policy initiative that suggested an evaluation of all of the resource sufficiency tests with a policy initiative that would be more narrowly focused on the flex ramp test. PSE supports the broader initiative as formulated in the stakeholder catalog, and further supports CAISO's suggestion of beginning the initiative with a workshop to identify the specific areas that would be addressed in the initiative. Additionally, PSE supports narrowing the scope of Item 6.1.2 to initially focus on the specific issues identified with the flex ramp test.

B. CONCLUSION

For the reasons set forth above, PSE recommends that CAISO should prioritize Catalog Items 6.1.2 and 6.1.4 in the annual policy roadmap, and respectfully notes that if necessary, CAISO could narrow the scope of Item 6.1.2 to focus on the Flexible Ramp Sufficiency test as an initial item.