

< EXTERNAL email. Evaluate before clicking. >

Dear CAISO,

PSE appreciates the opportunity to comment on the 2017 Stakeholder Initiatives Catalogue. It provides the following comments requesting clarification and proposed initiatives not listed in the catalogue.

Proposed Initiative:

Currently, the CAISO market has no way to determine definitively the Multi-Stage Generator (MSG) operating stage or configuration (unless the MW output is unique to a given stage), nor is there a way to efficiently communicate the output limits of each configuration. We must notify the market of the limits via outage cards, which causes inefficiencies in the market by not notifying the market as soon as possible. Ideally, the EIM Entity would be able to automatically communicate the real-time status of the MSG configuration and the limits via ICCP or other appropriate means. We request that CAISO hold a stakeholder process to be completed this year and allows for this information to be provided in real-time (without the need for outage cards), with the overall goal of the most efficient utilization of the assets.

- Request for Clarification:
- Additionally, PSE requests the CAISO add clarity to the following initiatives by providing an EIM indicator for each initiative, which PSE believes impacts the EIM:
  - 5.15 Full Network Model Enhancements – Phase 2
  - 7.1 Multi-Stage Generator Bid Cost Recovery
  - 7.2 Extended Pricing Mechanisms
  - 9.1 Real-Time Market Enhancements
  - 9.2 Hourly Bid Cost Recovery Reform
  - 9.4 Exceptional Dispatch Decremental Settlement
  - 11.5 Multi-Stage Generator Regulation Refinements
  - 11.6 Flexible Ramping Product Enhancements
  - 14.1 Energy Products Delivered on Interties

Thank you,

Tom Flynn

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