

**Comments of San Diego Gas and Electric on
EIM Greenhouse Gas Enhancements
2nd Revised Draft Final Proposal**

Submitted by	Company	Date Submitted
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San Diego Gas & Electric (“SDG&E”) appreciates the ability to comment on the new proposed EIM GHG Enhancements. While SDG&E is appreciative that the CAISO responded to stakeholder comments regarding issues with the two-pass solution, SDG&E is concerned with CAISO’s revised proposal. The main issue is the lack of clarity on the newly proposed methodology. The limited information provided at the February 22, 2018 conference call restricts stakeholders’ ability to understand and analyze CAISO’s proposed enhancements thereby resulting in a lack of meaningful stakeholder input. For example, the secondary dispatch emission rate calculation proposal leaves open many questions about how the rate will be calculated, the granularity of the rate, and whether the rates will provide appropriate market signals. We urge the CAISO, in conjunction with the Air Resources Board, to re-engage stakeholders with further opportunities to discuss the EIM GHG Enhancements prior to elevating the proposal to the EIM Governing Body.