

## COMMENTS OF IDAHO POWER COMPANY ON CAISO'S DAY-AHEAD MARKET ENHANCEMENTS WORKSHOP

Submitted By	Company	Date Submitted
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Idaho Power Company ("Idaho Power") appreciates the opportunity to comment on the California Independent System Operator's ("CAISO") June 19, 2018, workshop regarding the Day-Ahead Market Enhancements initiative. Idaho Power appreciates CAISO holding the workshop for participants to discuss the latest proposals.

Idaho Power understands that certain Energy Imbalance Market ("EIM")-related proposals in this initiative remain unchanged from the revised straw proposal published on April 13, 2018. Specifically, CAISO continues to propose that EIM base schedules be submitted with 15-minute granularity. This will necessitate changes to resource sufficiency evaluations and the under-/over-scheduling penalty.

Regarding the resource sufficiency evaluations, CAISO proposes to consider each 15-minute interval individually, and to limit the consequences of failure (limiting EIM transfers) to the 15-minute interval in which the failure occurs, rather than the full hour. Regarding the under-/over-scheduling penalty, CAISO proposes to determine whether the penalty applies for each 15-minute interval, rather than the full hour. Idaho Power strongly supports these proposals and encourages CAISO to include them in the draft final proposal.

Idaho Power understands that the proposed day-ahead flexible ramping product would not apply to the EIM at this time. Based on that, Idaho Power understands that

there are no additional flexible ramping product or ancillary services requirements, and no must-offer obligation, being imposed on EIM Entities. Idaho Power looks forward to further reviewing the day-ahead flexible ramping product concept in CAISO's next version of the proposal.

Idaho Power again appreciates the opportunity to submit these comments and is looking forward to continued collaboration with CAISO on these and other issues.