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**PacifiCorp’s Comments on the CAISO’s Revised Draft Policy Initiatives
Catalog Published August 12, 2020**

PacifiCorp appreciates the opportunity to comment on the revised draft 2021 Policy Initiatives Catalog published by the California Independent System Operator (“CAISO”) August 12, 2020, (“Catalog”).

PacifiCorp has observed that many of the policy initiatives described in the Discretionary section of the Catalog, which also affect the real-time market and/or specifically the EIM, do not indicate proposed EIM Governing Body classifications. PacifiCorp requests that the CAISO provide proposed EIM Governing Body classifications on those descriptions, consistent with the rest of the Catalog descriptions. PacifiCorp provides comments on specific Catalog descriptions as follows.

6.4 Day-Ahead Market Enhancements (I, C, 2)

PacifiCorp notes that the following section of the Day-Ahead Market Enhancements description is outdated and should be revised to describe the CAISO’s proposal for decoupling energy and capacity products with the introduction of reliability capacity up and reliability capacity down (RCU and RCD, respectively) products.

The CAISO is considering a design that introduces a new energy schedule, termed “reliability energy”, which replaces the existing residual unit commitment process and ensures efficient commitment and scheduling of resources to meet the CAISO net load forecast and cleared bid-in demand.

6.8 Multi Greenhouse Gas Area (D, 1)

PacifiCorp suggests that the categorization of this initiative be (C, 1), as it appears in the section of the Catalog describing initiatives that are in progress, planned, or that the CAISO has already committed to addressing.



7.1.4 Real-Time Flexible Ramping Product Enhancement (D) and 7.1.13 Flexible Ramping Product Enhancements

PacifiCorp seeks to understand why these two initiatives are listed in the Catalog separately and suggests that it may be appropriate to combine them under one initiative.

7.1.19 Over/Under Scheduling Load Enhancements (D, 1)

PacifiCorp believes that the word “revues” in the last sentence of the description should be “revenues”.

7.1.23 Full Network Model Expansion – Phase 2 (C, 2)

This initiative is categorized as (C, 2), but is described in the Discretionary section of the Catalog. PacifiCorp believes this initiative should be moved to Section 6.

Conclusion

PacifiCorp appreciates the CAISO’s consideration of these comments and looks forward to working with the CAISO and stakeholders on the 2021 Policy Initiatives Roadmap.