

Portland General Electric Comments on the ISO's CCDEBE Revised Draft Final Proposal

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Portland General Electric ("PGE") appreciates the opportunity to provide comments on the California Independent System Operator's ("ISO") Commitment Costs and Default Energy Bid Enhancements Revised Draft Final Proposal ("CCDEBE Proposal") published January 31, 2018¹.

General Comments

PGE continues to support the CCDEBE Proposal and the incremental improvements it will bring to price formation in the ISO's markets. PGE appreciates the ISO's responsiveness to stakeholders throughout the policy development process on this initiative and believes the ISO has brought forward a balanced draft final policy proposal with the latest changes.

PGE wishes to note that, due to the changes made since the original proposal clarifying the impact and applicability to Energy Imbalance Market (EIM) Entities and Participating Resource Scheduling Coordinators, it now agrees with the ISO's EIM Governing Body classification of "advisory" for this initiative.

¹ <http://www.caiso.com/Documents/RevisedDraftFinalProposal-CommitmentCosts-DefaultEnergyBidEnhancements.pdf>