

Submitted by	Company	Date Submitted
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Seattle City Light (City Light) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. City Light owns and operates resources with approximately 2,000 MW of flexible, fast-ramping, hydroelectric capacity. We regularly transact in the wholesale energy and transmission markets. City Light executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Energy Imbalance Market (EIM) in April 2019.

City Light thanks CAISO for the opportunity to provide these comments on its Revised Straw Proposal for Commitment Costs and Default Energy Bid Enhancements issued on August 2, 2017. City Light appreciates CAISO’s responsiveness to stakeholders’ request for more information following the publication of the Straw Proposal. CAISO’s decision to hold a second workshop on August 3, 2017, and to address individual stakeholders’ request for more detail on numerous parts of the proposal, helped us gain a better understanding the proposal.

City Light continues to support moving forward with this proposal, and encourages CAISO to prioritize its implementation for fall 2018. Should CAISO decide to implement a process to provide EIM participating generators the ability to more fully use opportunity costs in default energy bids, City Light would closely follow that initiative.

If you have any questions about these comments, please contact Yochi Zakai at yochanan.zakai@seattle.gov or 206-684-3534. City Light appreciates the opportunity to comment on the Revised Straw Proposal.