

Stakeholder Process: Consolidated EIM Initiatives**Summary of Submitted Comments**

Stakeholders submitted four rounds of written comments to the ISO under the Consolidated EIM Initiatives stakeholder initiative on the following dates:

- Round One (comments following Issue Paper), 06/30/2017
- Round Two (comments following Straw Proposal), 08/17/2017
- Round Three (comments following Draft Final Proposal), 09/22/2017
- Round Four (comments following 10/03/2017 Conference Call), 10/11/2017

Stakeholder comments were received from: Arizona Public Service Company, Department of Market Monitoring, NV Energy, PacifiCorp, Pacific Gas & Electric, Portland General Electric, Public Generating Pool, Powerex, Southern California Edison, Six Cities.

Stakeholder comments are posted at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ConsolidatedEnergyImbalanceMarketInitiatives.aspx>

Other stakeholder efforts include:

- Conference Call, 06/20/2017
- Stakeholder Meeting, 08/07/2017
- Conference Call, 09/12/2017
- Conference Call, 10/03/2017

Management Proposal: Implement enhancements to automate manual processes which will improve accuracy, efficiency and transparency in the EIM.					Management Response
	Automate matching of schedule changes with a single EIM non-participating resource	Automate updating of mirror system resources at ISO intertie scheduling points	Enable base EIM transfer system resource imbalance settlement	Enable submission of base generation distribution factors for aggregated EIM non-participating resources	
APS	Support	Support	Support	Support	<p>During the on-boarding phase of new EIM entities, enhancements to the EIM design may be necessary. As in the past, this was the case with the Powerex implementation. The enhancements developed through the stakeholder process are made available to all current and future EIM entities. This process may result in changes to the market design so that it can be used more broadly. In this initiative, the auto-matching feature, which originally only allowed a single non-participating resource to be used to match intertie schedule changes, was modified. Based on comments, the design was improved to allow all EIM entities to establish multiple sets of non-participating resources and intertie schedules to be defined.</p> <p>Currently, EIM entities must communicate manual adjustments to the market operator (ISO). The proposed enhancements will automate these manual actions which ensures market inputs are correct and timely. Additionally, the proposed enhancements will improve market modeling</p>
DMM	No Comment	No Comment	No Comment	No Comment	
NVE	Conditional Requests additional explanation: “(1) why the functionalities are necessary to facilitate Powerex joining the EIM and (2) how they will improve the functioning of the EIM and are not unduly preferential.”				
PacifiCorp	Support PacifiCorp supports the enhancement but recommends documentation explaining design details. PacifiCorp has concerns that this feature could result in increased NPR base schedule changes in the post T-40 timeframe.	Support	Support	Support	
PG&E	No comment PG&E did not comment on the proposed functionality of the enhancements. They did comment on the process of this initiative stating EIM related enhancements should undergo the entire stakeholder roadmap process to ensure problems are understood and solutions are fully vetted before implementation.				

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PGE	Support	Support	Support	Support	<p>and increase settlement transparency.</p> <p>Management has engaged with stakeholders to ensure the functionality of these enhancements is fully understood. In response to requests for additional implementation detail, the business requirement specification (BRS), which provides additional implementation details, was posted with the draft final proposal. Usually the BRS is posted after the policy changes have been approved by the EIM governing body or ISO board of governors.</p> <p>In response to stakeholder requests for more information on the Powerex implementation, Management held an additional conference call on 10/03/17 and extended another opportunity for stakeholders to submit written comments.</p> <p>In response to stakeholder concerns, the ISO will clarify in the tariff language that the auto-match feature will represent an action distinct from a manual dispatch action that can be used to balance intertie schedule changes that the EIM BAA</p>
PGP	Support	Support	Support	Support	
Powerex	Support Enhancement will provide more timely and accurate information to the EIM regarding movement of non-participating resources.	Support Automation will ensure the market receives timely and accurate information.	Support	Support Improves accuracy of network model employed in the EIM.	
SCE	Conditional SCE does not object to the enhancement assuming there are no adverse consequences. SCE raises concern that the EIM should resolve imbalance resulting from schedule changes. SCE believes manual dispatches, or automated adjustments in lieu of manual dispatches, should only be used for reliability reasons.	No comment	No comment	No comment	

Management Proposal: Implement enhancements to automate manual processes which will improve accuracy, efficiency and transparency in the EIM.					Management Response
	Automate matching of schedule changes with a single EIM non-participating resource	Automate updating of mirror system resources at ISO inertia scheduling points	Enable base EIM transfer system resource imbalance settlement	Enable submission of base generation distribution factors for aggregated EIM non-participating resources	
Six Cities	No comment	No comment	No comment	No comment	<p>needs to balance within its BAA outside of the real-time market.</p> <p>Only APS submitted written comments in response to the final conference call. Management therefore believes stakeholder questions and concerns have been adequately addressed.</p>

Management Proposal: Leverage the core non-generator resource modeling functionality in the EIM		Management Response
APS	Support	<p>The core non-generator resource model was implemented as a part of the ISO's <i>Energy Storage and Distributed Energy Resource</i> policy initiative. The model is generally applicable in the ISO markets and therefore it is appropriate for the EIM Governing Body to have an advisory role in its approval.</p> <p>Management has identified additional opportunities for use of the core model outside of the EIM. For example, it can be utilized to allow neighboring balancing areas to provide regulation down. In order to do this, market rules need to be clarified in the ISO tariff.</p>
DMM	Support Clearly defined tariff rules are needed for application of market power mitigation to Generic NGR resources.	
NVE	No comment NVE did not comment on the proposed functionality. They did comment on the classification of the proposal and requests clarification to understand why this item does not fall under the EIM Governing Body's hybrid approval authority requiring both EIM Governing Body and CAISO Board of Governors authorization. In response, Management held a conference call on 10/03/17 to answer questions and provide clarifications. NVE did not submit additional written comments after the conference call.	
PacifiCorp	Support PacifiCorp requests the ISO continue engaging with stakeholders to better understand the generic NGR model to improve usability by participants.	
PG&E	No comment	
PGE	Support	
PGP	Support	
Powerex	Support	
SCE	No comment	
Six Cities	No comment	