



To: Regional Issues Forum Liaisons

Email: EIMRIF@caiso.com

Re: RIF Carbon Workshop Summary

Regional Issues Forum Liaisons,

PGP appreciates the opportunity to comment on the Western EIM Regional Issues Forum Summary of Issues from the June 2019 Carbon Workshop. PGP provides the following responses to the questions identified in the summary document.

Is this summary an accurate reflection of the topics discussed at the carbon workshop?

- PGP believes this summary is a good high-level account of the issues identified in the meeting. Each of the 5 issues included under GHG attribution challenges are quite detailed and complex, but the summary does a good job of capturing the key issues. As noted below, PGP believes additional discussion on each of the issues to more fully define the issues and the different stakeholder perspectives on the issues would be useful.

Is it beneficial for the Regional Issues Forum to organize future meetings and workshops to enable similar discussions on carbon policies and their impacts?

- The issues identified in the workshop are important and impact the efficiency of the western electricity and carbon markets. Currently, there is no other forum that can draw from such a wide geographic footprint to address these issues. PGP believes it would be beneficial for the Regional Issues Forum to organize future meetings and workshops to further explore the issues that have been identified. Specifically, PGP recommends picking one or two of the challenges and exploring the issue in detail and also providing for discussion of potential solutions.

If the Regional Issues Forum should have future meetings and workshops to enable similar discussions are there any specific participants that should be included.

- PGP believes the inclusion of state agencies and commissions from across the western states in the discussions is very helpful to ensure market participants are considering the policy interests of all the states in the EIM footprint.

Comments submitted by:

Laura Trolese, ltrolese@publicgeneratingpool.com, (360) 513-6465
Therese Hampton, thampton@publicgeneratingpool.com, (360) 852-7366