



Peak Reliability (Peak) appreciates the opportunity to comment on the EIM Year 1 Enhancements Phase 2. Peak offers the following comments.

Relationship to ECC

Peak would like to continue to coordinate with CAISO on the relationship and impacts of the proposed changes to congestion management within the EIM to the Enhanced Curtailment Calculator (ECC)/webIntegrity.

EIM-Wide Transmission Rate

Peak appreciates the analysis that CAISO performed on the pre-EIM and post-EIM impact on forward scheduling. As CAISO continues to monitor the impacts on forward scheduling, Peak notes that changes to forward scheduling may have an impact on the accuracy of Peak's Operational Planning Analyses. To the extent that CAISO sees a decrease in forward scheduling, Peak would like to coordinate with CAISO on methods to assure that Peak has the most accurate forecast information possible.

Outage Reporting to Peak

Peak appreciates the coordination that CAISO has done on this issue. As discussed earlier, Peak notes that changes to the Coordinated Outage System (COS) will be necessary to fully implement this.