



July 12, 2018

To: EIM Governing Body Members

SUBJECT: Support for EIM GHG Attribution Enhancements

PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 95% of which is carbon-free. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA.

PGP members are not currently participants in the EIM. However, BPA and other BAAs continue to evaluate the costs and benefits of EIM participation. For PGP, a key consideration for ISO and EIM market participation is evaluation of the role that market rules play in proper price formation and equitable treatment of resources both within the market footprint and outside the footprint. Accurate GHG accounting is important to ensure equity and appropriate valuation of carbon-free resources.

PGP supports the proposed GHG Attribution Enhancements. Specifically, we believe limiting the GHG bid quantity of EIM participating resources to the MW value between the EIM participating resource's base schedule and the resource's upper economic level is an important modification to the current method. While this enhancement may reduce the quantity of secondary dispatch emissions, continued monitoring and evaluation of this issue is needed.

Finally, if a stakeholder initiative is launched to examine the extension of the day-ahead market to EIM entities, PGP believes the issue of GHG attribution needs to be a central issue for discussion. PGP does not believe this approach has direct applicability to the day-ahead market and other approaches may need to be considered.

PGP thanks the CAISO for its responsiveness to stakeholder feedback in making the above changes in this Final Proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Therese Hampton".

Therese Hampton, Executive Director
Public Generating Pool