



## Stakeholder Comments Template

### Day-Ahead Market Enhancements Phase 2 Initiative

This template has been created for submission of stakeholder comments on the issue paper and straw proposal that was published on February 28, 2019. The paper/proposal, Stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/Day-AheadMarketEnhancements.aspx>

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on March 21, 2019.

| Submitted By   | Organization        | Date Submitted |
|--|---------------------|----------------|
| Camille Christen<br><a href="mailto:cchristen@idahopower.com">cchristen@idahopower.com</a> | Idaho Power Company | April 4, 2019  |

**Please provide your organization’s comments on the following issues and questions.**

As a general matter, Idaho Power Company (“Idaho Power”) supports the California ISO’s (“CAISO”) efforts to address uncertainty in its markets and enhance the markets and reliability. That being said, Idaho Power does not currently transact in the Day-Ahead Market and does not have comments on the specific proposals.

If CAISO and stakeholders proceed with an initiative to extend the Day-Ahead Market to Energy Imbalance Market Entities (“EDAM”), there will be a much larger footprint and set of regulatory and transactional frameworks that need to be considered. CAISO should recognize that any solutions it adopts here may need to be reevaluated and refined in an EDAM initiative, if one proceeds.

Idaho Power does not have further comment on the specific questions and topics below. Idaho Power thanks CAISO for the opportunity to comment.

#### 1. Proposed Day-Ahead Market Structure

Please provide your organization’s feedback on the proposed day-ahead market structure topic as described in section 3 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the proposed day-ahead market structure topic as described in section 3 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

## **2. Day-Ahead Flexible Ramping Product**

Please provide your organization's feedback on the Day-Ahead Flexible Ramping Product as described in section 4 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the Day-Ahead Flexible Ramping Product as described in section 4 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

## **3. Re-Optimization of Ancillary Services**

Please provide your organization's feedback on the re-optimization of ancillary services as described in section 5 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the re-optimization of ancillary services as described in section 5 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

## **4. Energy Imbalance Market Governing Body Classification**

Please provide your organization's feedback on the EIM Governing Body classification as described in section 6 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the EIM Governing Body classification as described in section 6 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

## **APPENDIX C: DRAFT TECHNICAL DESCRIPTION**

### **5. Assumptions and Mathematical Formulations**

Please provide your organization's feedback on the assumptions and mathematical formulations included in Appendix C. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the assumptions and mathematical formulations included in Appendix C. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

### **Additional comments**

Please offer any other feedback your organization would like to provide on the Day-Ahead Market Enhancements Phase 1 initiative third revised straw proposal.