



Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager.

California ISO Policy Initiatives Catalog Submission Form			
Date: 6/28/2022			
Submitter Information			
Organization	Contact Name	E-mail	Phone
Salt River Project	Jerret Fischer	jerret.fischer@srpnet.com	602-236-2370
Please provide a title for the issue.			
Unit Initial Condition and Configuration Improvements			
Please provide a summary description of the issue (i.e. 500 words)			
This initiative was submitted by SRP for the 2022 catalog and is being resubmitted for 2023. There are cases where unit telemetry is just slightly above or below a configuration Pmin or Pmax, and the initial condition for configuration is misinterpreted by the WEIM market. Even being a fraction of a MW outside of the range can cause poor market results such as unexpected dispatch operating targets (DOT) or transitions. This request is to enhance the determination of configuration initial conditions by increasing deadband or by other means. This will allow units to avoid being "stuck" in a transition zone or above or below a unit Max or Min.			
Please provide any data/information available that would characterize the importance or magnitude of the issue.			
The most important issues are either when the unit telemetry is between two configuration limits or when the unit is running just below minimum load. In the case of telemetry between unit configurations, the market solution may be poor because it assumes the unit is in the middle of a transition. In the case of telemetry just below Pmin, the market could issue a shutdown.			

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Please provide a title for the issue.			
Base Scheduling Below Pmin Enhancement			
Please provide a summary description of the issue (i.e. 500 words)			
<p>This initiative was submitted by SRP for the 2022 catalog and is being resubmitted for 2023. In the Spring 2021, SRP participated in Market Simulation to test the ability to submit base schedules below Pmin to account for startup energy. During the simulation, SRP worked with CAISO to identify that the Startup Ramp Time parameter specified in the Generator Resource Data Template (GRDT) was not flexible enough to allow the use of warm and cold startups. This parameter is required to be the same as or shorter than the hot startup time registered. Therefore, for warm or cold startups, this parameter does not represent the true startup ramp time required to get to Pmin. Test results from Market Simulation indicated that base scheduling below Pmin for additional hours beyond the startup ramp time would be unexpected by the market, and startups would therefore not be able to be scheduled. The internal DOT would then be zero for the hours beyond the duration of the Startup Ramp Time. A solution to this would be to allow for the submission of hot, warm, and cold Startup Ramp Time parameters in the GRDT, though other options may exist as well.</p>			
Please provide any data/information available that would characterize the importance or magnitude of the issue.			
Base scheduling below Pmin for warm and cold startups or for startups beyond the startup ramp time is not currently a viable solution for unit types such as combined cycle. It may prevent participants from being able to implement the recent change to allow base schedules below Pmin for startup.			

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Please provide a title for the issue.			
Accounting for Upward Transition Costs in Settlements after Economic Commitments to Lower Configurations			
Please provide a summary description of the issue (i.e. 500 words)			
<p>This initiative was submitted by SRP for the 2022 catalog and is being resubmitted for 2023. A recent case was identified where a Multi-Stage Generator (MSG) was base scheduled in an upper configuration but was instructed to transition to a lower configuration per economic commitment by the WEIM. Due to a long minimum down time/transition time, the Short Term Unit Commitment (STUC) run did not identify the need to transition back up to the higher configuration shortly after the STUC horizon. The unit met its minimum down time, but it did not stay in the lower configuration much longer. The transition cost was then not accounted for in the market decision to move back to the upper configuration in a subsequent market run because the unit continued to be base scheduled in the upper configuration. It is our understanding that this transition cost is also not accounted for in Bid Cost Recovery (BCR) or other settlements processes, even though it is a direct result of the market decision to transition to the lower configuration. One solution might be to keep the transition cost out of the market optimization decision, but later account for it in the BCR process in the event the unit does not recover its cost for following the transition instruction.</p>			
Please provide any data/information available that would characterize the importance or magnitude of the issue.			
<p>In this case, it is estimated that these types of market decisions could result in losses in the thousands of dollars per instruction, depending on market conditions. This proposal would ensure that participants do not lose for following market instructions that do not consider economics/higher loads beyond the STUC horizon.</p>			

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Please provide a title for the issue.			
Market to not provide zero dispatch operating targets (DOT) causing infeasible solution			
Please provide a summary description of the issue (i.e. 500 words)			
<p>SRP has experienced several cases where bids are missing/updated for the resources, and the market solution was to provide zero dispatch operating targets (DOT). This has caused reliability issues for BAA operations. SRP has CIDI ticket# 237417 which acknowledged that CAISO has identified a defect that causes 0 DOTs in certain combinations of multi-stage generation (MSG) resources and bids, or lack of bids in all configurations. CAISO has a proposed solution under consideration by the MES and legal teams.</p> <p>SRP heard that other market participants have raised similar concerns.</p> <p>SRP requests CAISO implement a mechanism to provide a non-zero DOT aligned with the base schedule of the resource instead of zero DOT under the scenarios where bid misalignment will cause an infeasible market solution. SRP has also submitted an enhancement request through CIDI # 251822 for similar scenarios.</p>			
Please provide any data/information available that would characterize the importance or magnitude of the issue.			
On April 22, 2021, at 9:05 when one of SRP's resources went from 400MW to zero DOT due to misalignment of bids, SRP observed BAAL high exceedance for more than 20 minutes. There was a non-zero base schedule for the resource and yet the market provided a zero DOT solution. This caused an inrush of ETSR causing BAAL high exceedance.			