

Western Power Trading Forum on the CAISO's Pseudo-Ties of Shared Resources Draft Final Proposal

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The Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

Comments

WPTF appreciates the opportunity to submit these brief comments on the CAISO's Pseudo-Ties of Shared Resources Draft Final Proposal discussed on July 17 with stakeholders. WPTF appreciates the additional discussion provided in the paper and on the call regarding economic offers from dynamic scheduled resources that are located in an EIM BAA. As explained in our last set of comments, restricting the ability for dynamic schedules to economically offer in the real-time market is discriminatory, decreases flexibility in real-time, and contradicts several aspects of the CAISO's existing market structure. Thus, WPTF was pleased to hear that the CAISO is no longer proposing that dynamic scheduled resources located in an EIM BAA can no longer submit economic offers.

However, WPTF would like to take this opportunity to receive additional clarification from the CAISO around the ability for dynamic scheduled resources to economically offer under the proposal. In the paper, the CAISO states that the preferred way to implement a dynamic transfer from EIM Entity BAAs is a pseudo-tie because economic offers from pseudo-ties do not have the same concerns as economic offers from dynamic schedules.¹ The CAISO then includes a note that per existing tariff only one dynamic schedule can be associated with one physical unit unless the CAISO approves an implementation plan.² Given these two points raised by the CAISO, WPTF would like the CAISO to confirm that in the event a participant would like to establish a dynamic schedule resource from a physical unit that (1) is already associated with another dynamic schedule resource, (2) located in an EIM Entity BAA, and (3) would like the

¹ See pg. 9

² See footnote 15

ability to economically offer, the CAISO will in good faith develop and approve an implementation plan and not only facilitate such a resource under the pseudo-tie model.

WPTF appreciates the CAISO's consideration of these comments.