

 California ISO	Market and Infrastructure Policy	Template Version:	1
		Document Version:	0
Policy Initiatives Catalog Submission Form		Date Created:	6/1/2017

California ISO Policy Initiatives Catalog Submission Form			
<p>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.</p>			
<p>Date: 8/21/2017</p>			
Submitter Information			
Organization	Contact Name	E-mail	Phone
Bonneville Power Administration	Todd Miller	temiller@bpa.gov	503-230-7315
<p>Please provide a title for the issue.</p>			
<p>Shortening EIM Timelines for Binding Schedules</p>			
<p>Please provide a summary description of the issue (i.e. 500 words)</p>			
<p>The CAISO should address the issue of shortening the EIM timelines for binding schedules from the current T-57 to something closer to the T-20 timeframe used by transmission holders throughout WECC. The right to change transmission schedules up to 20 minutes before delivery has been the accepted WECC standard for decades and the EIM rules impose potential penalties and increased costs for exercising these rights after T-57. Allowing the adjustment of transmission schedules closer to time of flow promotes more accurate scheduling and makes the utilization of generation and transmission assets more efficient leading to less energy imbalance and lower costs. The EIM is intended to provide imbalance energy, but arguably the timelines imposed by the EIM create more imbalance, given the variable energy resources forecast and load forecast changes as you get closer to real time operations.</p> <p>The issue of shortening the scheduling timelines was raised when the EIM was being developed and again at the FERC technical conference in October 2016. Now that the EIM has matured and automation appears to be working, it is time to shorten the timelines so that they are more consistent with the long-standing WECC-wide scheduling timelines. Doing so will benefit the CAISO, EIM Entities, EIM participants, and other transmission customers of the EIM Entities. This issue not only impacts wheel through customers; it also impacts transmission customers that are serving loads inside the EIM balancing area with long-term transmission contracts. Shortening the timeline for binding schedules would provide better incentives for non-EIM participants serving loads in the EIM balancing authority to schedule more accurately and impose less imbalance on the EIM balancing authority.</p>			

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Please provide any data/information available that would characterize the importance or magnitude of the issue.

CAISO's policy of not recognizing tag adjustments made between T-57 and T-20 imposes significant costs on customers. For example, from July 2016 to July 2017, BPA has been charged approximately \$510,000 by one EIM Entity for schedule changes made after T-57. These schedule changes made the schedule more accurate and therefore should have decreased the amount of imbalance on the system, yet BPA was charged for imbalance anyway.