

### **Comments of Boston Energy Trading and Marketing on 2017 Stakeholder Initiatives Catalog**

Boston Energy Trading and Marketing (“Boston Energy”) appreciates the opportunity to comment on the draft 2017 Stakeholder Initiatives Catalog, as posted by the CAISO on September 15, 2016. Boston Energy’s comments focus on improvements to the CAISO real-time Inter-SC trade process that, if implemented, will enhance scheduling of renewable generation into the CAISO system.

#### **Extending the submission deadline or allow updates for Real-Time Inter-SC trades**

Boston Energy requests the CAISO add a new discretionary item to the 2017 catalog that would either (a) extend the submission deadline for real-time physical inter-SC trades and/or (b) allow adjustments to be made to a previously submitted real-time physical inter-SC trade. Such a change would improve the scheduling process for Variable Energy Resources (VERs) whose SC is required to submit real-time physical inter-SC trades with a counterparty.

Order 764 implementation introduced the ability for VERs to have their FMM and RTD schedules set by the most recent energy forecast calculated by the ISO. These forecasts are calculated for the binding and forward intervals of RTPD and RTD on a continual basis throughout the day. Given the submission deadline for real-time physical inter-SC trades and real-time bids, the current forecast available from the ISO at the time when the physical inter-SC trade is required to be submitted is the T-105. This T-105 forecast is often times very different than the binding FMM and RTD forecasts used for setting schedules, and as a result creates additional imbalance energy than what is seen by the ISO. This is because the ISO sees imbalance energy as the difference between the VERs binding RTD forecast and actual output, where the VER also see additional imbalance energy between the real-time physical Inter-SC trade MWs and actual output.

To better align the MWs associated with a VERs real-time physical inter-SC trade and its binding RTD final forecast, Boston Energy requests the CAISO either extend the inter-SC physical trade submission deadline until some period after the hour is completed or allow VERs to update their inter-SC physical trade MW value some period after the hour is completed. Either of these options would allow the VER’s physical inter-SC trade MWs to match the hourly integrated binding RTD final forecast and avoid imbalance energy between the IST and actual output.

The concept of allowing submissions and updating of inter-SC physical trades is not new to the CAISO or to the larger ISO industry. CAISO current market rules allow day-ahead inter-SC trades to be submitted up to 30-minutes after the posting of the day-ahead market results. PJM allows for their version of real-time inter-SC trades (e-schedules) to be submitted/updated by a defined deadline the next day.

### **Inter SC Trade Adjustment Symmetry (9.3)**

In the 2016 stakeholder catalog process NRG proposed a project to introduce Inter-Scheduling Coordinator Trade Adjustment Symmetry (9.3). Boston Energy supports NRG request's as the current process for adjustment real-time inter-SC trades doesn't take into account the Order 764 changes for renewable resources. Allowing symmetrical adjustments based on the T-45 VER forecast would help eliminate some, not all, of the imbalance energy risk VERs face due to the submission deadline for real-time inter-SC physical trades.

If you have any questions please let me know.

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