

Comments on CAISO's September 5, 2019 2020 Final Policy Initiatives Catalog

September 20, 2019

CDWR would like to submit the following comments:

Due to FERC Order 841, DWR recommends CAISO should re-classify Item 6.1.48 "Aggregated Pumps and Pumped Storage" that is currently Discretionary (D) to be FERC mandated (F).

Final Catalog Excerpt:

6.1.48 Aggregated Pumps and Pumped Storage (D)

This initiative would include enhancements to participating load that would improve participating load's ability to participate more fully in the market. Since the implementation of the CAISO's nodal market in 2009, participating load's functionality has been limited to providing non-spinning reserves. State Water Project recommends that the CAISO conduct a study on what improvements could be made to participating load functionality that would provide system benefits and conforms to pumping load/pumping storage limitations. For instance, SWP believes that the ability for participating load to bid demand in the real-time market would greatly reduce the current barriers to participating load's participation in wholesale demand response and possibly improve system reliability during over-generation periods. Also, by allowing participating load to change its demand bid in the real-time market, participating load could potentially better respond to ramping needs by shifting demand during critical ramping periods when water conditions permit.