

2013 Stakeholder Initiatives Catalog

Dated: January 28, 2013
Comments Submitted: February 13, 2014

Summary:

Calpine appreciates the opportunity to submit these comments.

We address only one aspect of the most recent draft which is the apparent rejection of one of the highest ranked initiatives. Specifically, the CAISO disposes of the ELMP initiative summarily by indicating that “we believe that our (and stakeholders’) resources would be better applied to other highly ranked initiatives”. If the ISO intended to substitute its own judgment for ours (as expressed through our rankings) why did it ask us for our views in the first place?

Calpine acknowledges that education, investigation, consideration and implementation of some form of Extended LMP would be a significant effort – and one that must be balanced with other initiatives. Nonetheless, we propose that the ISO reconsider its rejection of *any* action on the initiative.

Rather than no movement, Calpine would be willing to work with the CAISO to begin the education and investigation aspects of an ELMP project. Indeed, PJM has initiated such a process and is being appropriately deliberate as it considers alternatives to address non-convexities -- see, e.g., <http://www.pjm.com/committees-and-groups/task-forces/emustf.aspx>

These activities would not require an “overwhelming amount of time and resources”, but rather the administrative support and relationships to invite academics and practitioners to discuss and expose the benefits associated with reducing uplift and better pricing. This first year of work could have the modest goals which support, but do not necessarily result in go-no-go decisions and implementation details.

Thanks