Calpine Comments **Revised Draft 2015 Stakeholder Initiatives Catalog** **Dec 5, 2014**

Section Number	Initiative	Grid Reliability	Improving Overall Market Efficiency	Desired by Stakeholders	Total Benefit Score	Market Participant Implementation ($ and resources)	ISO Implementation ($ and resources)	Total Feasibility Score	Total Rank Score	Calpine Comments Ho Ho Ho
3.11	Generator Contingency Modeling	7	~~7~~	3	**17**	7	7	**14**	**31**	**No Comment**
3.40	**Extend Look Ahead for Real Time Optimization**	7	7	~~3~~ 5	**17**	1 0	3	**13**	~~**30**~~ **32**	**Very helpful to allow MSG transitions in RT, as 4.5 hour look ahead eliminates possible beneficial transitions**
2.30	Multi-Day Unit Commitment in the Integrated Forward Market (IFM)	7	7	~~7~~ 3	**21**	7	0	**7**	~~**28**~~ **24**	**The days are numbered for long-start units. The interim solution (72-hour RUC) seems sufficient to commit and represent these resources in IFM.**
11.14	Multiple Resource IDs per Generation Meter	3	7	3	**13**	7	7	**14**	**27**	**No comment**
2.40	Multi-Stage Generator Bid Cost Recovery (BCR)	3	3	7	**13**	7	7	**14**	**27**	**No comment**
3.20	DLAP-Level Proxy Demand Response	0	3	7	**10**	1 0	7	**17**	**27**	**Might consider deferral pending Court action**

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3.70	Hourly Bid Cost Recovery Reform	~~3~~ 5	7	7	**17**	7	3	**10**	~~27~~ **29**	Should allow more liquidity in RT markets
5.20	Blackstart and System Restoration	3	7	~~7~~ 3	**17**	7	3	**10**	~~27~~ **23**	Appears to be a small, but vocal group of advocates
11.10	PacifiCorp Related Tariff Changes	3	7	3	**13**	7	7	**14**	**27**	No Comment
10.7.1	Comprehensive Review Methodology for Determining Maximum Import Capability	~~3~~ 0	3	~~7~~ 3	**13**	7	7	**14**	~~27~~ **20**	Appears to be a small, but vocal group of advocates Does nothing to improve grid reliability
10.7.2	Reallocation of Maximum Import Capability Between Electrically Adjacent Import Paths to Achieve State Policy Objectives	~~3~~ 0	3	~~7~~ 3	**13**	7	7	**14**	~~27~~ **20**	Appears to be a small, but vocal group of advocates Does nothing to improve grid reliability

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10.7.3	Allocation of Maximum Import Capability Among Load Serving Entities	3	3	7	**13**	7	7	**14**	**27**	**No Comment**
12.70	Affected Systems	3	3	7	**13**	**7**	**7**	**14**	**27**	**No comment**
4.10	Consideration of Non-RA Import Energy in the RUC Process	3	7	3	**13**	1 0	3	**13**	**26**	**No Comment**
10.20	Active Power Control Interconnection Requirements for Variable Energy Resources	3	3	3	**9**	7	~~1~~ ~~0~~ 6	**17**	~~**26**~~ **22**	**Seems the ISO's systems to dispatch and control ramps would be costly and time consuming**
10.30	Reactive Power Control Requirements	10	~~7~~ 3	3	**20**	**3**	**3**	**6**	~~**26**~~ **22**	**May very well affect reliability, but not sure there are efficiency benefits.**
11.50	Combined Demand Response Product	3	7	7	**17**	7	0	**7**	**24**	**Might consider deferral pending Court action and or Energy storage Roadmap**

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3.50	Extended Pricing Mechanisms	~~3~~ 7	~~7~~ 1 0	7	**17**	7	~~0~~ 5	**7**	~~24~~ **32**	**Allocating uplift costs to ramps would encourage liquidity and plant modifications.** **Pricing uplift into the market sends proper (efficient) price signals for consumption and supply.** **Phase 1 – in 2015 -- should be the inexpensive development of a white paper and evaluation of costs and benefits.** **Phase 2 implementation after 2015 , if supported, would have the higher costs envisioned in this ranking.**
6.80	Review the CRR Clawback Rule	0	7	3	**10**	7	7	**14**	**24**	**No Comment**
2.50	Full Network Model Expansion - Phase 2	7	7	3	**17**	**3**	**3**	**6**	**23**	**Let's figure out how phase 1 is working first!!**
6.1	2014 CRR Modifications	~~3~~ 0	7	3	**13**	**7**	**3**	**10**	~~23~~ **20**	**Grid reliability benefit is suspect.** **If pursued, should be tied to outage reporting initiatives.**
7.30	Implement Point-to-Point (PTP) Convergence Bids	3	7	7	**17**	3	3	**6**	**23**	**No Comment**

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10.10	2015 Interconnection Process Enhancements	3	7	7	**17**	**3**	**3**	**6**	**23**	**No comment**
11.11	Rescheduled Outages	3	3	3	**9**	7	7	**14**	**23**	**No Comment**
2.60	Difference Bidding in Integrated Forward Market for Energy Storage Resources	3	3	3	**9**	**7**	**7**	**14**	**23**	**No Comment**
8.60	Multi-Year RA Import Allocation Process	7	3	3	**13**	7	3	**10**	**23**	**No Comment**
5.30	Fractional MW	3	3	3	**9**	7	7	**14**	**23**	**No Comment**
	Regulation Awards									**No comment**
7.40	Review of Convergence Bidding Uplift Allocation	0	3	7	**10**	7	3	**10**	**20**	**No Comment**

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6.70	**Outage Notification Requirements**	~~0~~ 5	~~3~~ 7	~~3~~ 7	**6**	7	7	**14**	~~20~~ **36**	**Better notification of both "pending" and "approved" outages will increase situational awareness and increase liquidity in CRR markets.** **Modifications to outage notification should be tied with any CRR reallocation initiatives.**
7.10	Allowing Convergence Bidding at CRR Sub-LAPs	0	3	3	**6**	7	7	**14**	**20**	**No Comment**
11.90	Integrated Optimal Outage Coordination	0	7	3	**10**	7	3	**10**	**20**	**No comment**
8.40	Simplified Reporting of Forced Outages	0	0	3	**3**	1 0	7	**17**	**20**	**No comment**
3.13	Price Formation at Interties	0	3	3	**6**	7	7	**14**	**20**	**No Comment**

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6.90	Congestion Revenue Rights Allocation	0	3	3	**6**	7	7	**14**	**20**	**No comment**
7.20	Convergence Bidding Clawback	0	3	3	**6**	7	7	**14**	**20**	**No Comment**
11.40	Aggregated Pumps and Pumped Storage	3	3	3	**9**	7	3	**10**	**19**	**No Comment**
5.60	Regulation Service Real-Time Energy Make Whole Settlement	3	3	3	**9**	7	3	**10**	**19**	**No Comment**
10.40	Transmission Interconnection Process	3	3	3	**9**	7	3	**10**	**19**	**No comment**
11.12	Storage Generation Plant Modeling	3	3	3	**9**	7	3	**10**	**19**	**No Comment**

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6.20	Economic Methodology to Determine if a Transmission Outage Needs to be Scheduled 30 Days Prior to the Outage Month	0	~~3~~ 0	~~3~~ 1	**6**	7	3	**10**	~~16~~ **11**	**The market need more, not less visibility on outages.**
6.30	Flexible Term Lengths of Long Term CRRs	0	3	3	**6**	7	3	**10**	**16**	**No comment**
6.40	Insufficient CRR Hedging	0	3	3	**6**	7	3	**10**	**16**	**No Comment**
6.50	Long Term CRR Auction Sub-initiative 1: multiple rounds for a given annual auction	0	3	3	**6**	7	3	**10**	**16**	**No Comment**
6.60	Multi-period Optimization Algorithm for Long Term CRRs	0	3	3	**6**	7	3	**10**	**16**	**No Comment**

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8.50	Clarify Energy Products Delivered on Interties	3	3	3	**9**	3	3	**6**	**15**	**No comments**