

DC Energy Comments on Generator Contingency and RAS Modeling

Submitted by	Company	Date Submitted
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DC Energy appreciates the opportunity to provide comments on the California Independent System Operator (CAISO), November 7, Generator Contingency and RAS Modeling Revised Issue Paper and Straw Proposal.

DC Energy supports the CAISO's efforts to reduce out-of-market actions and utilize the market optimization to manage generator and Remedial Action Scheme (RAS) contingencies. The CAISO's Issue Paper and Straw Proposal provided examples of how the proposal would result in greater market efficiency and the lowest cost solution for maintaining system security immediately following a generator or RAS contingency event. Another significant benefit related to explicitly modeling the contingencies in the security constrained economic dispatch is increased transparency. Today the ISO utilizes manual interventions to manage generator and RAS contingencies and the actions are not reflected in prices for energy. This is a subpar outcome that obfuscates the impacts of the actions taken to secure the system. Accordingly, the proposal represents a unique opportunity to move toward practices that promote market confidence and market based incentives through transparent price signals. We believe this is especially important given the growing number of RASs, which was reported to include 19,800 MW of armable generation in the Revised Issue Paper and Straw Proposal.

During the last stakeholder call for the initiative the CAISO indicated they would provide more details on how the generator and RAS contingencies would be modeled in the CRR market. We look forward to reviewing and commenting on the CRR market aspects of the proposal. In addition, we request that the ISO provide implementation details for the contingencies and the general frequency the ISO expects the related preventive constraints might be enforced. We look forward to reviewing the full proposal and request that as the initiative progresses the CAISO continue to provide ample time for stakeholder review and opportunity to provide input.