

**From:** Beane, Laura [mailto:Laura.Beane@iberdrolaren.com]  
**Sent:** Thursday, October 16, 2014 4:13 PM  
**To:** Stakeholder Initiatives Catalog  
**Cc:** Almeida, Keoni; Price, Jim; Klovstad, Siri  
**Subject:** Iberdrola Renewables Comments - 2015 Stakeholder Initiatives Catalog

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Iberdrola Renewables appreciates the opportunity to submit comments on the CAISO's 2015 Stakeholder Initiatives Catalog. Iberdrola Renewables is in the process of making its wind resources in the state of California dispatchable and capable of responding to price signals in the CAISO market. Dispatchable wind will significantly improve the CAISO's ability to effectively and reliably manage and optimize its system. With the increase in renewable resources in California, the CAISO must facilitate the ability for entities to move from self-schedules to economic bids. This will be particularly important to help manage the anticipated increase in over-generation events due the growth of renewables in the CAISO's footprint. Iberdrola Renewables is the Scheduling Coordinator for 570 MWs of wind in CAISO's system. Many of these wind resources have multiple off-takers (i.e. multiple Purchased Power Agreements exist for a single resource). The CAISO's current system limitation of a single Resource ID per meter hampers participant's ability to submit economic bids. It is essential that the CAISO change its system configuration to allow modeling of multiple "pseudo-generators" with independent Resource IDs to enable each off-taker to submit separate bids. This capability exists in the MISO, PJM, and the ERCOT and dispatchable wind in these markets has provided significant benefit in the form of cost-effective and reliable dispatch. Iberdrola Renewables proposes the CAISO move quickly to enable this critical functionality by including it as part of the Expanding Metering & Telemetry Options initiative and recognizing this initiative as high priority given its "Significant Improvement" to both Grid Reliability and Improving Overall Market Efficiency.

Many thanks.

Laura Beane



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