



Comments of LS Power
on
CAISO DAME 15-minute Granularity Second Revised Straw Proposal

Submitted by	Company	Date Submitted
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LS Power appreciates the opportunity to provide comments on CAISO’s Day Ahead Market Enhancements Fifteen-minute Granularity, Second Revised straw proposal. LS Power supports CAISO’s proposal and its implementation in a phased approach. We encourage CAISO to continue working towards meeting the goal of implementing Phase 1 elements of this proposal by Fall of 2020 or sooner. The elements proposed under Phase 2, in particular the addition of a day-ahead flexible ramping product, are also critical in helping CAISO meet its strategic vision of leading the transition to a low carbon grid and reliably managing the grid. We encourage CAISO to schedule technical workshops for discussion of Phase 2 elements at the earliest so Phase 2 can also be implemented shortly after Phase 1.

Day Ahead Market Phase 1:

LS Power supports the two key elements of DAME Phase 1 proposal: (1) move from hourly to fifteen-minute scheduling in the day-ahead market and (2) introduction of fifteen-minute bidding granularity in both the day-ahead and real-time markets. We believe these are both positive changes which should help provide CAISO with the necessary tools it needs to better manage uncertainties it often experiences in the real-time markets.

Non-Generator Resources providing AS:

Per CAISO's proposal, Non-generating resources (NGRs) with a state of charge will be required to be capable of a 30 minute discharge to be awarded regulation-up, spinning reserves and non-spinning and 30 minute charge to be awarded regulation down. Also, LS Power understands that CAISO is considering implementing this element of the proposal prior to 2020. LS Power believes that this will be a positive change. We support this element of CAISO proposal and in particular its possible implementation prior to 2020.