

Stakeholder Comments

Price Performance Analysis – First Paper

Submitted by	Company	Date Submitted
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Upon completion of this template, please submit it to initiativecomments@caiso.com

NCPA greatly appreciates CAISO's commitment and effort to study questionable systemic price patterns and periodic extreme price divergence across markets. The first paper was very informative and helpful in identifying issues associated with operator induced out of market unit commitments as well as operator input adjustments when CAISO systems produce results that do not keep pace with volatile ambient conditions.

NCPA also appreciates CAISO's flexibility in expanding the scope of the study to include Q1 2019. However, due to the release of Commitment Cost Enhancements Phase 3 on April 1, 2019, NCPA is convinced that the study will be incomplete without including samples from the current paradigm and implores CAISO to include Q2 2019 (Apr., May, Jun. 2019) in the final paper. NCPA understands that this is a not an insignificant request and will appreciate if, at a minimum, CAISO evaluate extreme FMM SMEC divergence events that took place during evening ramps in April 18, 23, 24, and 25 and June 10, 11, and 12. Please refer to CIDI ticket 212508 for the April events where NCPA observed invalid FMM schedules that corresponded with extreme FMM price divergence. We appreciate the responsiveness and detail provided in the CIDI ticket however the responses lead to more questions and we feel more light can be shed on such events during this study. Feel free to contact NCPA with questions regarding those specific dates.

NCPA greatly appreciates the quality work CAISO has provided in this study and wishes to assist CAISO in identifying any issues that may adversely affect fair and reasonable market results so that such deficiencies may be addressed in future stakeholder process.