

Comments on Generated and Outage Reporting for Non-Resource specific RA Resources

Submitted By	Company or Entity	Date Submitted
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Powerex appreciates the opportunity to provide these comments on the CAISO's Generated Bids and Outage Reporting for Non-Resource Specific Resource Adequacy Resources (NRS-RA) Proposal. Powerex generally supports the proposed changes with some qualifications. Several clarifications must be made with the details of the planned implementation. The Tariff and the BPM must be updated to reflect the final design and the exact time of the implementation must be very precise due to the use of SLIC for NRS-RA resources being exactly opposite to the current use. Powerex further recommends that this implementation be effective at a month end due to the Settlements configuration changes that would be required and due to the fact that these are monthly charge codes being impacted.

Per the Tariff section 40.9.7.2 NRS-RA's are not penalized for being unavailable if they aren't allowed to bid on their RA resource ID due to an Open Tie. Under the Tariff, SC's are prohibited from bidding on an Open Tie per Section 30.8 of the Tariff.

Currently (A), the availability of an NRS-RA resource, is determined by the MW's bid or absence of a Bid in SIBR, in the relevant hours, on the RA Resource ID. For the relevant hours, that availability (A) is divided by (B), the Monthly RA Resource Capacity Sold in the relevant hours, to determine (C) the % availability for the month. Currently the CAISO is using the presence of a SLIC outage on the RA resource to indicate that the RA resource does NOT have an obligation in that hour which removes that hour from the list of relevant hours from both (A) and (B). Currently a SLIC outage is used to show that the Resource is available but the market participant prohibited from bidding the energy into the market due to an Intertie Outage. And further, if the Resource is partially or totally unavailable, then this is demonstrated by a bid in SIBR for less than the RA obligation but a SLIC outage is not required.

In this proposal, the use of SLIC outage data is being reversed and SLIC outage data is being used to indicate that a Resource is unavailable and presence/absence of bids will no longer be used in the RA availability calculation. Powerex agrees that this is the appropriate use of SLIC and SIBR. However, this change requires that CAISO implement some different method of determining for SCP Settlements charge codes, that the NRS-RA resource did not have an RA Obligation in that hour, due to the Intertie being open. Currently the Tariff section 40.9.7.2 requires that an SC report to the CAISO all hours where the Intertie is Open and prevents an SC from bidding their RA requirement. The BPM for Reliability Requirements Section 8.1.4.7, requires the SC to report via SLIC that the Open Tie is preventing the SC from bidding their RA obligation.

Powerex proposes that as part of this implementation, the CAISO should use the posted OTC rating of the relevant path to determine if the intertie was Open and eliminate from the Tariff section 40.9.7.2, the requirement for SC's to report this situation. Powerex believes that the current CAISO initiative to reject bids on Open Ties is a useful enhancement that eliminates the reporting requirement.

Thank you for the opportunity to provide this feedback and for considering these implications.

For your reference, here are the relevant sections of the Tariff and Reliability Requirements BPM:

Tariff 40.9.7.2 Availability Calculation for Non-Resource-Specific System Resources Providing Resource Adequacy Capacity

The availability of Resource Adequacy Capacity provided by a non-Resource-Specific System Resource will be measured by its hourly offers of Economic Bids or Self-Schedules to provide Energy or, if certified to provide Ancillary Services, Bids for or submissions to Self-Provide Ancillary Service capacity into the CAISO Day-Ahead Market in accordance with the requirements of Section 40.6, for all of the Availability Assessment Hours. Specifically, the resource's availability will be calculated as the sum of the MW-hours reflected in the resource's submitted Day-Ahead Economic Bids and Self-Schedules over all Availability Assessment Hours, divided by the sum of the resource's designated non-exempt Resource Adequacy Capacity for all Availability Assessment Hours, times one hundred (100) to obtain a number between zero (0) and one hundred percent (100%). The Scheduling Coordinator for Resource Adequacy Capacity provided by non-Resource-Specific System Resources is expected to secure sufficient transmission rights to deliver the Resource Adequacy Capacity to its designated CAISO Scheduling Point. If in any given Availability Assessment Hour, the CAISO does not fully accept the Economic Bids or Self-Schedules submitted by the Scheduling Coordinator for the Resource Adequacy Capacity provided by non-Resource-Specific System Resources, the Scheduling Coordinator for that resource shall be deemed to have met its availability obligation for that hour. In determining monthly availability of a non-Resource Specific System Resource under Section 40.9.7.2, any hours in which the resource was prohibited by Section 30.8 from bidding across an out-of-service transmission path at its designated Scheduling Point will be excluded from the calculation. Scheduling Coordinators for non-Resource Specific System Resources must submit a monthly report of such hours occurring under Section 30.8, in the format and manner described in the Business Practice Manual for Reliability Requirements.

BPM for Reliability Requirements

8.4.1.7 Out-of-Service Transmission Path

A non-Resource-Specific System Resource cannot submit Economic Bids or Self-Schedules in the IFM when the transmission path at the Scheduling Point is completely out-of-service (i.e., transmission path rating is 0 MW). Scheduling Coordinators for non-Resource-Specific System Resources with Resource Adequacy Capacity may submit the Availability Assessment Hours in a month where the transmission path at the Scheduling Point is out-of-service as described in Tariff Section 30.8 using the SLIC application. The process to submit hours for out-of-service transmission path will be described in ISO Operating Procedure T-113. The submittals for non-Resource-Specific System Resource must only be those hours where the transmission path was rated at 0 MW and the resource was unable to schedule the Resource Adequacy Capacity. No other availability limitations can be reported for non-Resource-Specific System Resources.