### WESTERN ENERGY IMBALANCE MARKET

# Market Monitoring Update: Resource Sufficiency Tests in the Energy Imbalance Market

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### Background

- Two types of test performed as part of resource sufficiency evaluation each hour for each 15-minute interval:
  - Bid range capacity test (a.k.a "capacity test")
  - Flexible ramping sufficiency test (a.k.a. "sufficiency test")
- If an EIM balancing area fails either of these tests, net EIM imports into the area cannot increase beyond level of net imports at that time.
  - When imports are limited, EIM areas much more likely to have power balance constraint violations.
  - Prices often hit \$1,000 bid cap during power balance constraint violations.
- Purpose of tests:
  - Ensure sufficient resources are scheduled/offered in EIM to cover load forecast and ramping needs (plus some uncertainty).
  - Deter excessive or intentional "leaning" by individual EIM areas for capacity needed to meet loads and uncertainty.
  - Viewed by FERC as a mechanism to help deter exercise of market power through physical withholding of resources.





#### Current issues

- Errors in capacity test calculations discovered during 2020 corrected in February 2021.
- High participant interest in increased transparency about details of tests.
- Uncertainty component added to bid range capacity test (June 16).
- Changes in calculation of available bid range capacity and flexible ramping sufficiency test being considered.
- Changes to consequence of failing tests?
  - e.g. instead of limiting imports, perhaps impose capacity charge?
- How to extend bid range capacity and flexible ramping sufficiency tests to a day-ahead market for EIM.





### Incorrectly failing to exclude capacity on outages or derates lead to very few failure of the capacity test in 2020.

### Number of capacity test failures (15-minute intervals)

California ISO	0	0	0	4	6	0	0	0	0	0	0	0
Arizona PS	0	0	4	0	0	1	0	0	0	0	0	9
BANC	0	0	0	0	0	0	1	1	0	2	1	0
ldaho Power	0	0	0	0	0	0	0	0	0	0	0	0
NV Energy	0	0	0	1	1	0	0	0	0	3	6	0
PacifiCorp East	0	0	0	0	0	0	0	0	0	0	4	0
PacifiCorp West	0	3	0	0	0	0	0	0	0	0	4	0
Portland GE	0	0	0	0	0	0	0	0	0	0	0	0
Powerex	12	6	8	6	10	0	0	0	2	2	3	0
Puget Sound En	0	2	0	0	0	0	0	0	0	0	0	0
Salt River Project				7	0	0	0	0	0	3	2	0
Seatle City Light				0	4	0	6	2	0	0	0	0
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	2020											

See Resource Sufficiency Tests in the Energy Imbalance Market, DMM report, May 20,2021.

<u>http://www.caiso.com/Documents/Report-on-Resource-Sufficiency-Tests-in-the-Energy-Imbalance-Market-May-20-2021.pdf</u>



## With capacity on outages or de-rates correctly excluded, a significant number of capacity test failures would have occurred.

#### Additional capacity test failures with errors fixed (15-minute intervals)

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California ISO	0	0	0	0	0	0	0	10	1	0	0	0
Arizona PS	0	0	0	0	2	1	0	0	0	1	0	0
BANC	0	1	0	0	0	4	5	6	5	6	3	0
Idaho Power	0	0	0	0	0	0	2	0	0	0	0	0
NV Energy	0	0	1	1	27	16	76	138	56	48	20	8
PacifiCorp East	0	0	0	0	0	1	0	13	1	0	0	0
PacifiCorp West	0	1	0	0	0	3	2	0	0	7	1	2
Portland GE	0	0	0	0	0	0	13	2	7	9	1	0
Powerex	0	0	0	0	0	0	0	0	0	0	0	0
Puget Sound En	0	4	2	0	2	71	146	71	28	20	1	0
Salt River Project				5	2	1	7	29	39	47	40	0
Seatle City Light				0	1	0	0	7	5	2	2	0
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	2020											

Results exclude intervals with flexible ramping sufficiency test failures, since failing either test triggers transfer limits.





### With uncertainty added and capacity on outages or de-rates excluded, more capacity test failures would have occurred.

### Additional capacity test failures with errors fixed <u>plus adjustment in</u> <u>requirement for uncertainty</u> (15-minute intervals)

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California ISO	1	0	0	0	0	0	0	15	2	0	0	0
Arizona PS	0	2	3	0	11	2	5	1	1	17	6	30
BANC	0	1	0	0	0	7	13	12	14	10	3	1
ldaho Power	0	0	0	0	0	32	15	19	4	0	0	0
NV Energy	0	0	1	3	73	45	173	305	147	107	44	11
PacifiCorp East	0	0	1	0	0	7	16	61	10	7	0	0
PacifiCorp West	7	4	1	0	2	13	17	5	0	34	14	25
Portland GE	1	0	3	0	1	0	45	31	34	50	9	2
Powerex	10	3	3	5	9	1	0	0	7	4	2	0
Puget Sound En	5	8	27	0	7	126	275	123	61	45	11	0
Salt River Project				18	9	3	37	74	120	111	77	1
Seatle City Light				0	8	0	6	15	11	3	2	6
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	2020											

Results exclude intervals with flexible ramping sufficiency test failures, since failing either test triggers transfer limits.





### **DMM** Recommendations

- Provide all data needed for EIM areas to replicate tests.
- Closely monitor impact of adding uncertainty component.
- Consider eliminating some additional capacity from the bid range capacity test, which is unavailable because of various operating limitations:
  - Long start times beyond the horizon of the real-time market.
  - Units subject to maximum or fixed exceptional (or manual) dispatch issued by grid operators.
  - Ramp-constrained capacity immediately following an outage.
- Discuss/consider changes to consequence of failing tests.
  - e.g. instead of limiting imports, perhaps impose capacity charge.