

California Department of Water Resources State Water Project

Comments on CAISO's Revised Draft 2015 Stakeholder Initiatives Catalog

December 5, 2014

On November 20, 2014, CAISO posted the Revised Draft 2015 Stakeholder Initiatives Catalog followed by a web conference on November 21, 2014. California Department of Water Resources State Water Project (SWP) appreciates the opportunity to provide comments.

Comments to CAISO's High-level Ranking:

Section Number	Initiative	Grid Reliability	Improving Overall Market Efficiency	Desired by Stakeholders	Total Benefit Score	Market Participant Implementation (\$ and resources)	ISO Implementation (\$ and resources)	Total Feasibility Score	Total Rank Score
11.4	Aggregated Pumps and Pumped Storage	3	3	3	9	7	3	10	19

Grid Reliability – CAISO's rating: 3; SWP suggested revised rating: 10

Improving the capabilities of Participating Load (PL) allows for more operational flexibility to respond to grid fluctuations brought on by added intermittent renewable resources. By adding the ability for PL to bid in the Real-Time Market (RTM), PL may respond to over-generation conditions, perform load shifting in the RTM to aid in ramping shortages, or provide additional demand response services that can improve grid reliability.

Improving Overall Market Efficiency - CAISO's rating: 3; SWP suggested revised rating: 7

Enhancements to PL will increase the pool of resources to respond to over-generation conditions and assist with ramping needs. Availability of more economic solutions can potentially reduce the use of out of market solutions (e.g. exceptional dispatches) which would improve market efficiency.

Comments to CAISO's Response to Stakeholder Comments:

Per CAISO's response to CDWR's comment regarding Regulatory Must-Run Pump Load, "CDWR requests, in response to the ISO's proposal to delete "13.2 Regulatory Must-Run Pump Load," that the ISO revive the previous communications the ISO and CDWR had regarding this issue. The ISO will leave this in the proposed deletion section pending further communications with CDWR".

As mentioned in SWP's comments to the Draft Catalog, in 2012, CDWR provided necessary information to CAISO including a CDWR proposal, but since then no activities took place in moving forward. The need for this initiative is to create a new scheduling priority class in the integrated forward market for pump loads with regulatory must run requirements. CDWR requests that CAISO revive the communications CDWR and CAISO made in 2012 with regard to this initiative to revisit and make a final determination whether to pursue or not.