

September 6, 2023

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket: ER15-2565-__
Independent Assessment by the Department of Market Monitoring
July 2023 Western Energy Imbalance Market Transition Period Report for Avangrid
Renewables**

Dear Secretary Bose:

The Department of Market Monitoring (DMM) hereby submits its independent assessment on the transition period of Avangrid Renewables (AVRN) during its first six months of participation in the Western Energy Imbalance Market (WEIM) for July 2023, as AVRN joined the WEIM on April 5, 2023.

Please contact the undersigned directly with any questions or concerns regarding the foregoing.

Respectfully submitted,

By: /s/ Eric Hildebrandt

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California ISO

Report on Western Energy Imbalance Market issues and performance: Avangrid Renewables for July 2023

September 6, 2023

Prepared by: Department of Market Monitoring

Executive summary

Pursuant to the Commission’s October 29, 2015 Order on the CAISO’s Western Energy Imbalance Market (WEIM), the California ISO (CAISO) filed a report on August 25, 2023 covering the period from July 1 through July 31, 2023 (July report) for Avangrid Renewables (AVRN) in the Western Energy Imbalance Market.¹ AVRN joined the WEIM on April 5, 2023, and the transition period will apply to the AVRN balancing authority area (BAA) until September 30, 2023.²

This report provides a review by the Department of Market Monitoring (DMM) of Western Energy Imbalance Market performance for the AVRN balancing authority area during the period covered in the CAISO’s July report. This is the fourth report for the transition period of the AVRN balancing authority area. Key findings in this report include the following:

- Prices in the AVRN area tracked below prices in the Pacific Northwest WEIM region during all hours.
- The AVRN balancing authority area failed the upward flexible ramping sufficiency test 7 times in July.
- There were no valid under-supply or over-supply infeasibilities in the 5-minute or 15-minute markets during the month.
- Transition period pricing did not impact AVRN area prices in the 15-minute market or the 5-minute market in July.

Section 1 of this report provides a description of prices and power balance constraint relaxations, and Section 2 discusses the flexible ramping sufficiency and bid range capacity tests.

¹ The CAISO’s July 2023 Report was filed at FERC and posted on the CAISO website on August 25, 2023: <http://www.caiso.com/Documents/Aug25-2023-Jul2023WEIMTransitionPeriodReport-AvangridRenewables-ER15-2565.pdf>

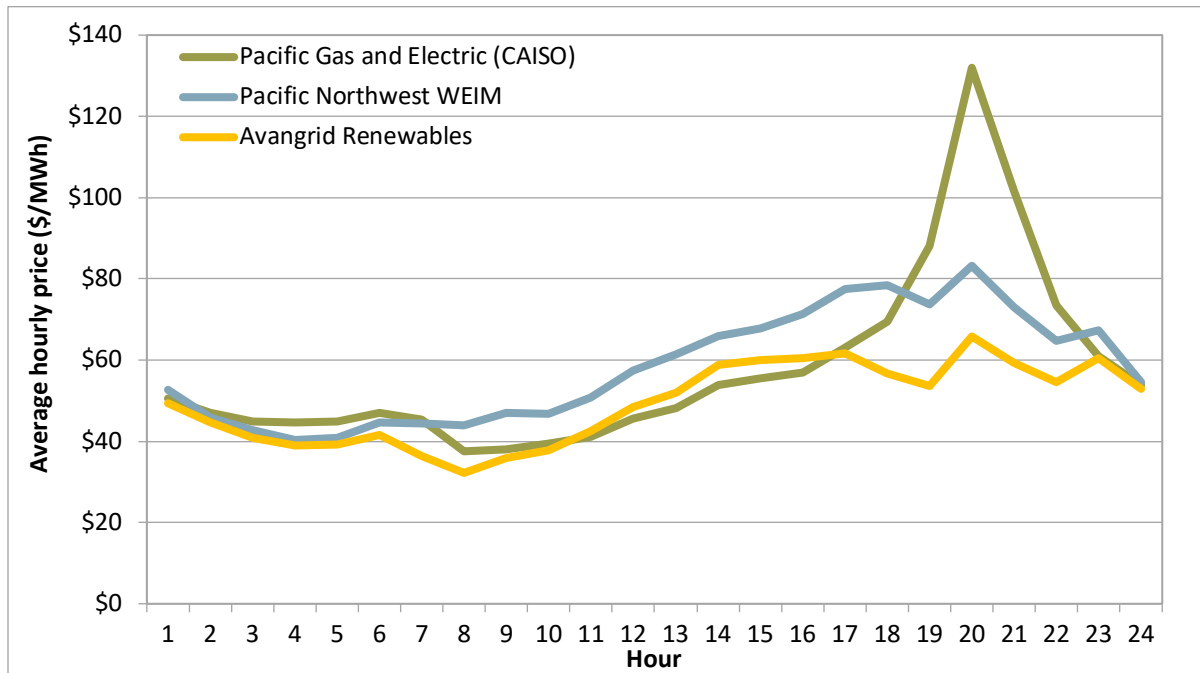
² This follows from the application of CAISO Tariff section 27(b)(1), which refers to a number of months rather than a number of days.

1 Western Energy Imbalance Market prices

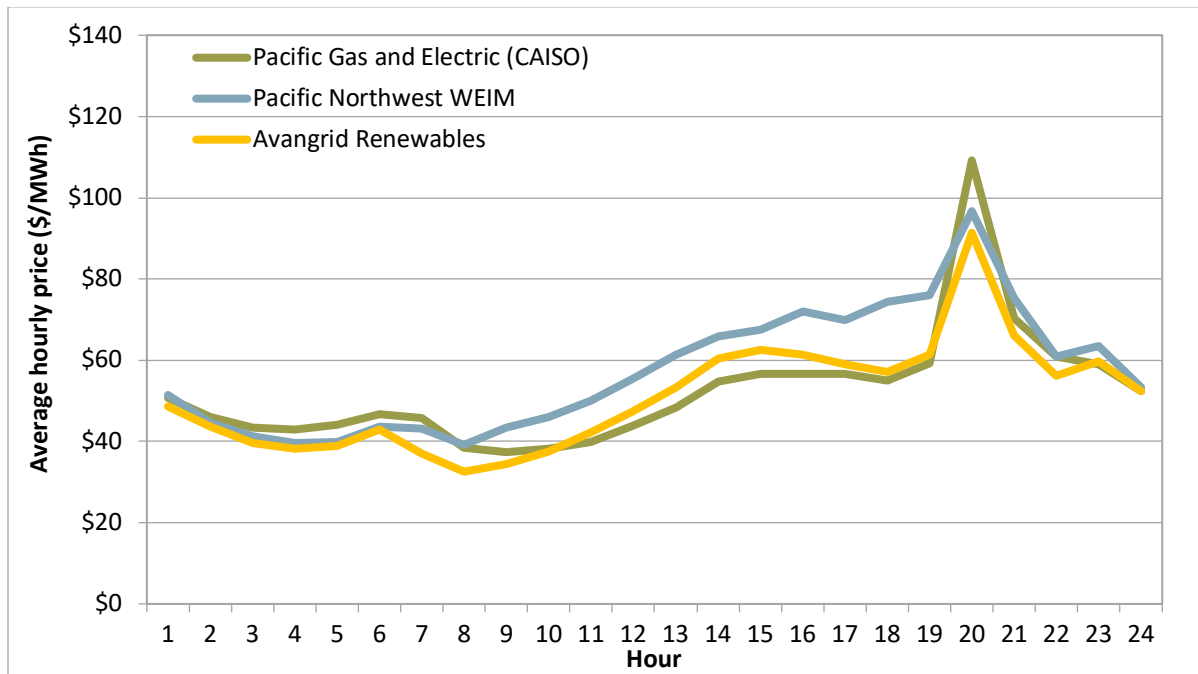
Figure 1.1 and Figure 1.2 show hourly average 15-minute and 5-minute prices during July for AVRN compared with prices in the CAISO at the Pacific Gas and Electric (PG&E) default load aggregation point and the average Pacific Northwest WEIM regional prices.³

Average prices in the Avangrid Renewables area tracked below prices in the Pacific Northwest WEIM region during all hours. For the month, AVRN prices averaged \$49.34/MWh in the 15-minute market and \$50.99/MWh in the 5-minute market.

Figure 1.1 Average hourly 15-minute price (July 2023)



³ The Pacific Northwest WEIM region includes PacifiCorp West, Portland General Electric, Puget Sound Energy, Seattle City Light, Powerex, Bonneville Power Administration, and Tacoma Power.

Figure 1.2 Average hourly 5-minute price (July 2023)

All power balance constraint relaxations that occurred in July were subject to the six-month transition period pricing that expires on October 1, 2023.² The transition period pricing mechanism sets prices at the highest cost supply bid dispatched to meet demand, rather than at the \$1,000/MWh penalty parameter while relaxing the constraint for shortages, or the -\$155/MWh penalty parameter while relaxing the constraint for excess energy.^{4,5} Power balance constraint relaxations can be grouped in the following categories:

- **Valid under-supply infeasibility** (power balance constraint shortage). These occurred when the power balance constraint was relaxed because load exceeded available generation. The CAISO validated that CAISO software was working appropriately during these instances.
- **Valid over-supply infeasibility** (power balance constraint excess). These occurred when the power balance constraint was relaxed because generation exceeded load. The CAISO validated that CAISO software was working appropriately during these instances.
- **Load conformance limiter would have resolved infeasibility.** The load conformance limiter automatically reduces the size of an operator load adjustment and sets prices at the last economic

⁴ When transition period pricing provisions are triggered by relaxation of the power balance constraint, any shadow price associated with the flexible ramping product is set to \$0/MWh to allow the market software to use the last economic bid dispatched.

⁵ The penalty parameter while relaxing the constraint for shortages may rise from \$1,000/MWh to \$2,000/MWh, depending on system conditions, per phase 2 implementation of FERC Order 831.

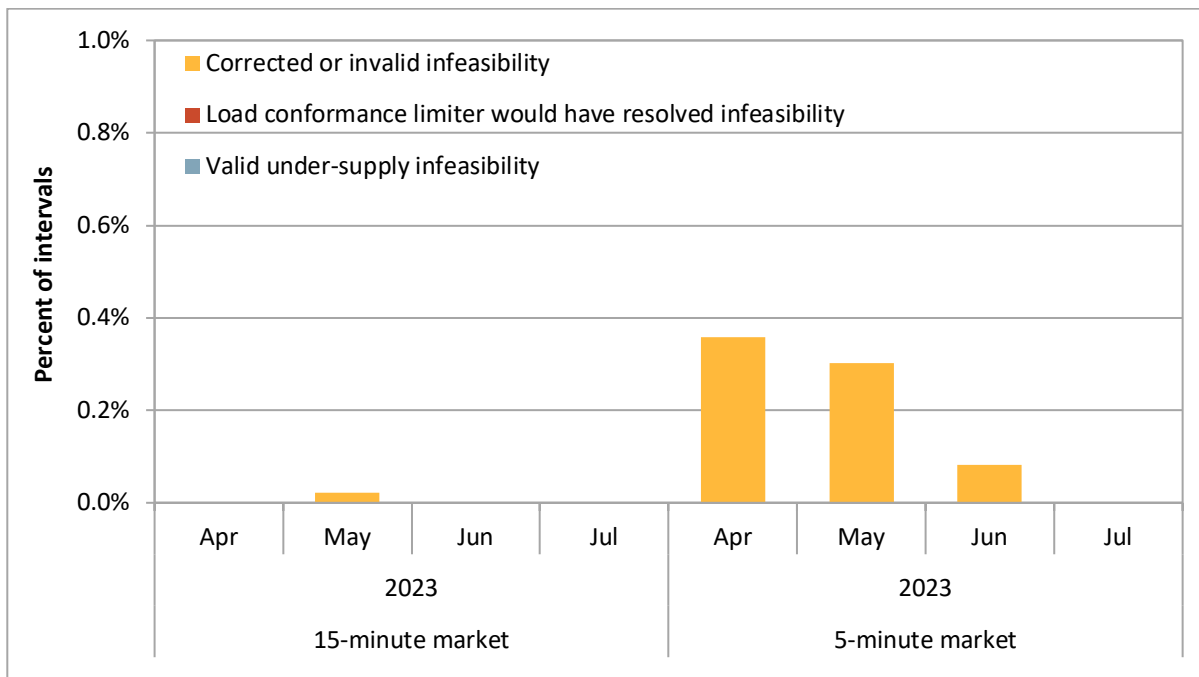
signal when the conditions for the limiter are met.⁶ During the transition period, the limiter does not change price outcomes because transition period pricing is applied during these intervals instead. However, in these cases, the load conformance limiter *would have resolved the infeasibility* had transition period pricing not been in effect.

- **Correctable infeasibility.** These occurred when the CAISO software relaxed the power balance constraint concurrent with a software error or data error that resulted in a price correction, or would have triggered a price correction if transition period pricing were not active.⁷

Figure 1.3 and Figure 1.4 show the monthly frequency of under-supply and over-supply infeasibilities in the 15-minute and 5-minute markets, respectively. In July, AVRN had no valid under-supply or over-supply infeasibilities in the 5-minute or 15-minute markets.

Additionally, there were no intervals during July when the load conformance limiter would have triggered in the 15-minute or 5-minute markets for the AVRN balancing authority area, had transition period pricing not been in effect.

Figure 1.3 Frequency of under-supply power balance infeasibilities by month Avangrid Renewables



⁶ The CAISO implemented an enhancement to the load conformance limiter, effective February 27, 2019. With the enhancement, the load conformance limiter triggers by a measure based on the change in load adjustment from one interval to the next, rather than the total level of load adjustment.

⁷ Section 35 of the CAISO tariff provides the CAISO authority to correct prices if it detects an invalid market solution or issues due to a data input failure, occurrence of hardware or software failure, or a result that is inconsistent with the CAISO tariff. During erroneous intervals, the CAISO determined that prices resulting under transition period pricing were equivalent to prices that would result from a price correction, so no further price adjustment was appropriate. For more information: http://www.caiso.com/Documents/Section35_MarketValidationAndPriceCorrection_May1_2014.pdf

**Figure 1.4 Frequency of over-supply power balance infeasibilities by month
Avangrid Renewables**

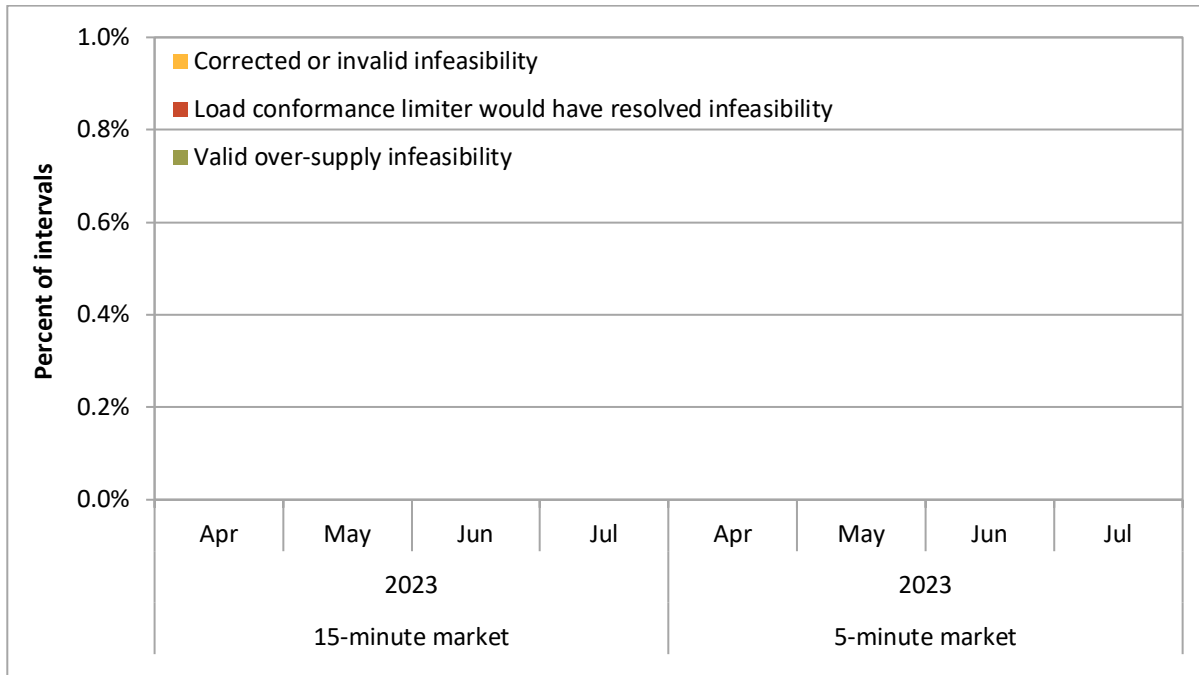


Figure 1.5 and Figure 1.6 show the average monthly prices in the 15-minute and 5-minute markets *with* and *without* the special transition period pricing provisions applied to mitigate prices in the AVRN area during the month.⁸ On average for July, transition period pricing did not impact AVRN area prices in the 15-minute or 5-minute markets.

⁸ A detailed description of the methodology used to calculate these counterfactual prices that would result without transition period pricing was provided on p. 7 of the January 2017 report for Arizona Public Service from DMM: http://www.caiso.com/Documents/May1_2017_Department_MarketMonitoring_EIMTransitionPeriodReport_ArizonaPublicService_Jan2017_ER15-2565.pdf

Figure 1.5 Average prices by month – Avangrid Renewables (AVRN) (15-minute market)

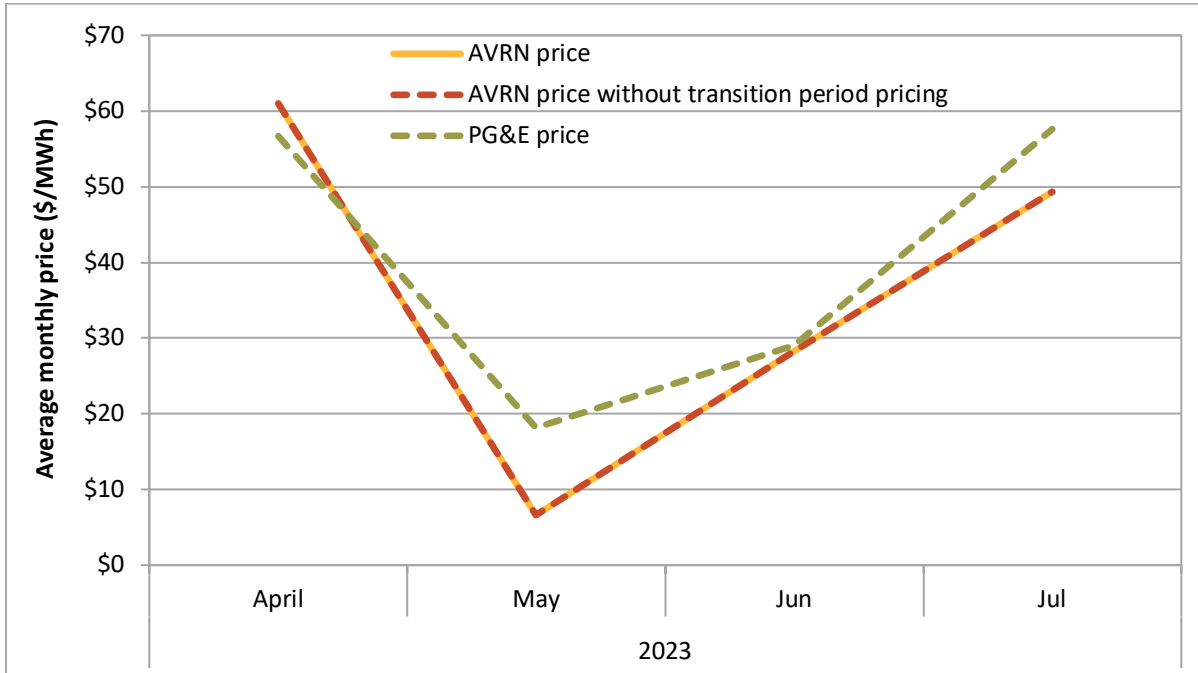
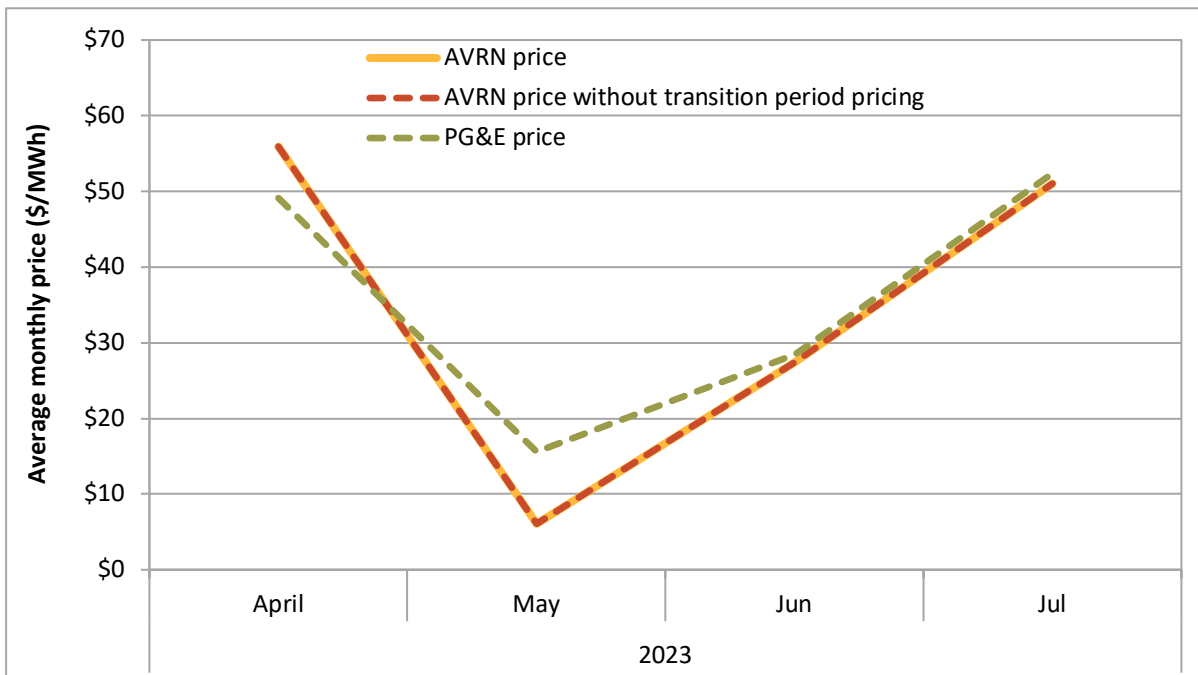


Figure 1.6 Average prices by month – Avangrid Renewables (AVRN) (5-minute market)



2 Flexible ramping sufficiency and bid range capacity tests

As part of the WEIM, each area including the California ISO is subject to a resource sufficiency evaluation. The evaluation is performed prior to each hour to ensure that generation in each area is sufficient without relying on transfers from other balancing areas. The evaluation includes two tests:

- **The bid range capacity test (capacity test)** requires that each area provide incremental bid-in capacity to meet the imbalance between load, inertia, and generation base schedules.
- **The flexible ramping sufficiency test (sufficiency test)** requires that each balancing area has enough ramping flexibility over an hour to meet the forecasted change in demand as well as uncertainty.

If an area fails either the bid range capacity test or flexible ramping sufficiency test, energy imbalance market transfers into that area cannot be increased.⁹ Failures of the capacity and sufficiency tests are important because these outcomes limit transfer capability. Constraining transfer capability may affect the efficiency of the WEIM by limiting transfers into and out of a balancing area that could potentially provide benefits to other balancing areas. Reduced transfer capability also affects the ability for an area to balance load, since there is less availability to import-from or export-to neighboring areas. This can result in local prices being set at power balance constraint penalty parameters.

Figure 2.1 shows the monthly frequency of upward and downward flexible ramping sufficiency test failures, while Figure 2.2 shows the number of bid range capacity test failures by month. The AVRN balancing authority area failed the upward sufficiency test during 7 intervals in July. There were no downward sufficiency test or capacity test failures by the AVRN balancing authority in July.

⁹ If an area fails either test in the upward direction, net WEIM imports (negative) during the hour cannot exceed the lower of either the base transfer or optimal transfer from the last 15-minute interval prior to the hour.

Figure 2.1 Frequency of upward and downward sufficiency test failures by month Avangrid Renewables (AVRN)

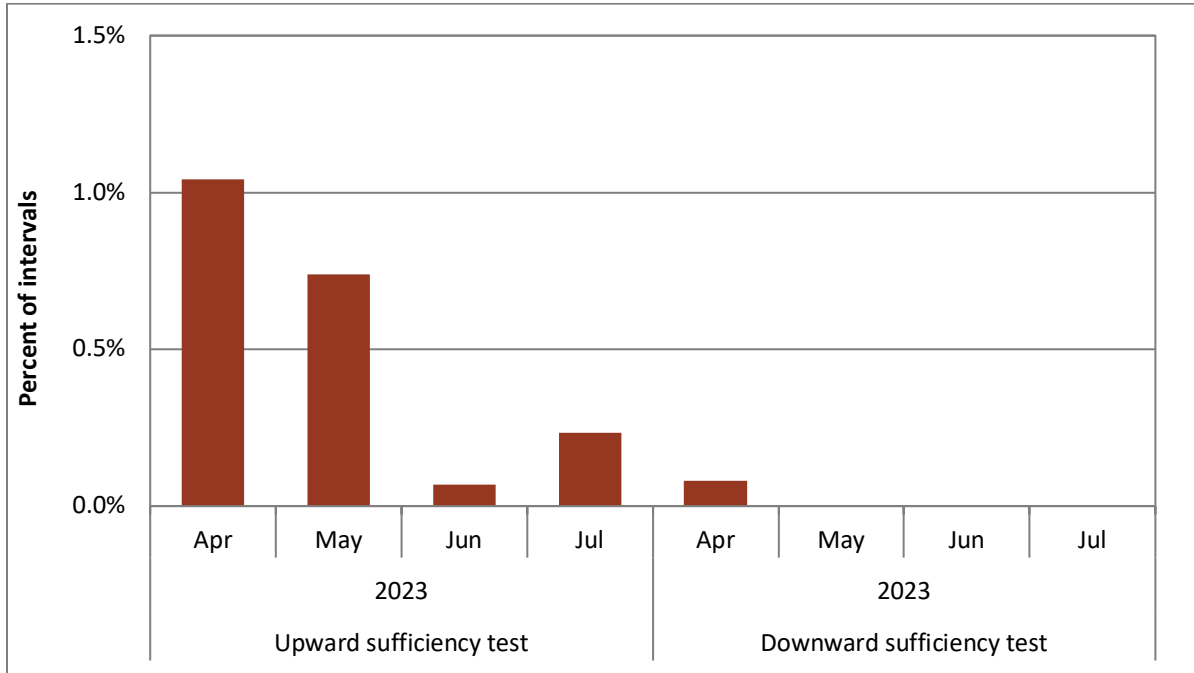
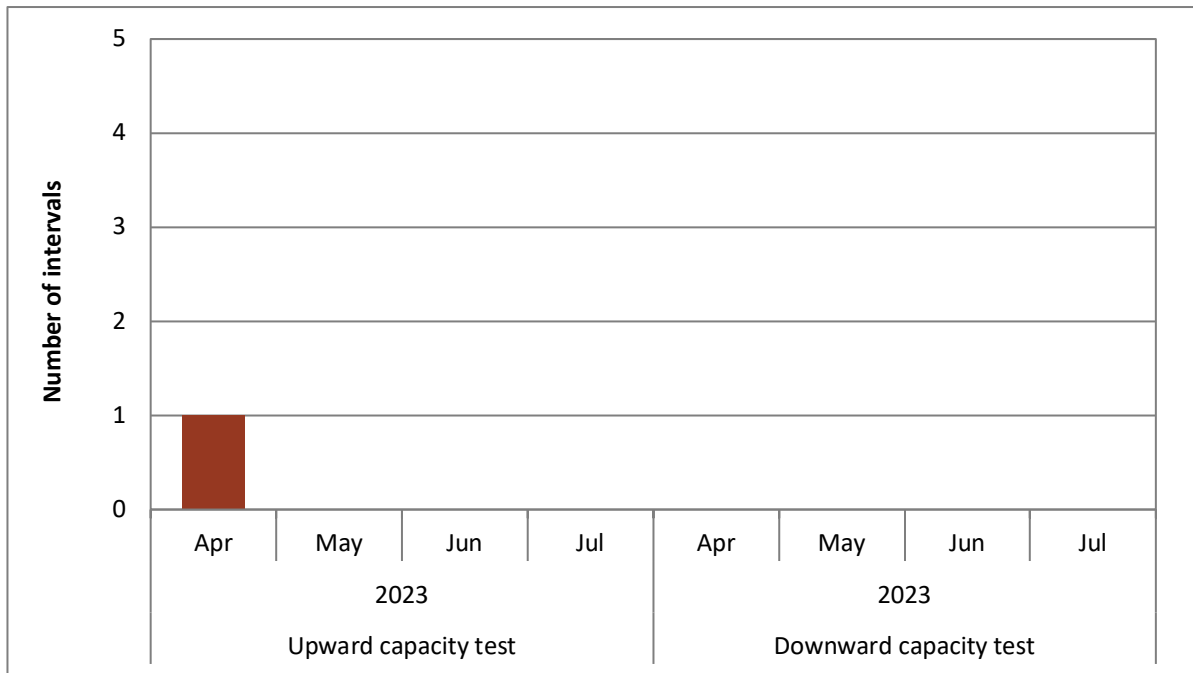


Figure 2.2 Frequency of upward and downward capacity test failures by month Avangrid Renewables (AVRN)



CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 6th day of September, 2023.

Isi Aprille Girardot

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