

The Western Area Power Administration (Western) appreciates the opportunity to comment on the CAISO's 2011 Market Design Initiative Catalog.

Western is interested in engaging in a pilot program to pseudo tie load from the CAISO to WAPA's sub-balancing area. The CAISO, in its Dynamic Transfer initiative had expressed "a willingness to develop pilot agreements for dynamic transfers of load".

Western also supports the following initiatives in the 2011 Market Design Initiative Catalog:

- Multi scheduling coordinators at a single meter (Section 12.23)
- Seasonal local RA requirements (Section 8.4)
- Export of Ancillary services from the ISO (Section 12.5)
- Improvements in the Imbalance Energy Offset design (Section 3.1)
- Use of lossy shift factors (Section 10.5)