

Western Power Trading Forum Comments on Commitment Cost Enhancements Phase 3 Tariff

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WPTF appreciates the opportunity to provide comments on the July 31, 2018 CCE Draft Tariff Language.

It is concerning that the CCE3 draft tariff market notice did not mention the removal of bid-in ramp rates.¹ The proposal to remove bid-in ramp rates dates so far back, WPTF cannot even recall which initiative the idea originally came up in and has been given little attention given the other significant and positive changes being done in the CCE3 initiative. That said, as far back as the ramp rate proposal can be traced, there is no indication that the CAISO intended to remove the ability for scheduling coordinators to offer in an operating ramp rate or regulation ramp rate. In fact the draft final proposal specifically talks only about energy offer bid in ramp rates.

“Ramp rates can currently be specified as a component of *daily energy bids*. The ISO has greatly enhanced the modeling capabilities of resources in the markets, such as multi-stage generating resources, reducing the need to accommodate daily bid-in ramp rates... (emphasis added).”²

This proposal does not appear to cover the changes proposed in Tariff Section 30.5.2.7 to remove the ability for a scheduling coordinator to submit a bid-in operating reserve ramp rate and regulation ramp rate.

WPTF is concerned about the removal of this ability for two reasons. First, it was not covered in any policy paper or discussion, so constitutes a policy change being done through the tariff process. Second, WPTF is aware that batteries have been using the regulation ramp rate as a means to manage the 4-second ACG jump under certain circumstances as well as have been relying on the energy bid in ramp rate at times. Given the increase in expected batteries on the system and their newness of many battery companies to the stakeholder process, WPTF supports reconsideration of the ramp rate proposal in its entirety pending additional stakeholder outreach.

Thank you for consideration of these comments.

¹ “The Commitment Cost Enhancements Phase 3 initiative includes the opportunity costs policy for use-limited resources and new rules for master file values.” July 31 market notice.

² <http://www.caiso.com/Documents/DraftFinalProposal-CommitmentCostEnhancementsPhase3.pdf> page 46.