

Western Power Trading Forum Comments on Excess Behind the Meter Production Straw Proposal

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The Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

Comments

WPTF appreciates the opportunity to submit comments on the CAISO's Excess Behind the Meter Production straw proposal posted September 5, 2018 and the stakeholder call held on September 12, 2018. WPTF is generally supportive of the proposal to increase visibility into excess behind the meter production and develop standardized reporting practices.

This initiative provides yet another opportunity to improve market transparency. WPTF asks the CAISO to consider publishing the excess behind the meter production data by Default LAP for each hour or by 5-minute interval. The data could be made available in real-time or via a monthly report. The additional information could provide valuable insights into the amounts of behind-the-meter production and its impact on pricing.

WPTF thanks the CAISO for consideration of our comments.