



Stakeholder Comments Template

Pseudo-Ties of Shared Resources

Submitted by	Organization	Date Submitted
<i>Mark Smith</i>	<i>Calpine</i>	<i>5/29/2020</i>

1. Metering and Telemetry Requirements

Please provide your organization's feedback on the metering and telemetry requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

Calpine supports the development, and subsequent CAISO approval of SC-Metered Entity SQMD (Settlement Quality Meter Data) plans. We recommend that the contents of the SQMD Plan be more explicitly described in a subsequent draft of this proposal. For example, the SQMD should include specific details regarding the allocation of meter data between to Shared Resources. The ISO may, as it has done with outage allocations, establish a default methodology – such as splitting meter data based on the relative 5-min DOTs, or some other well-established and visible metric.

2. Outage Management and Reporting Requirements

Please provide your organization's feedback on the outage management and reporting requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

Calpine supports the CAISO proposal. While contractual provisions or physical characteristics may result in disproportional allocations of outages, having the pro-rata default allocation is a reasonable foundation. We also support provisions that require each SC to individually report outages to the CAISO. The Protocol Administrator would have the obligation to report the allocation of any outage between and to every SC, but the reporting of outages – within the required timelines and provision of the tariff – would remain the obligation of the SC.

3. Treatment of Minimum Load and Start-Up Costs

Please provide your organization's feedback on the proposed treatment of minimum load and start-up costs, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

As highlighted on the stakeholder call, different technologies will have different start and min load characteristics. The allocation of those parameters should be left to the contractual parties, of course, with the review of the CAISO. As such, Calpine also supports the development (if not pre-existing) of a Shared Resource Allocation Protocol.

4. Additional comments

Please offer any other feedback your organization would like to provide on the issue paper and straw proposal.

Thanks.