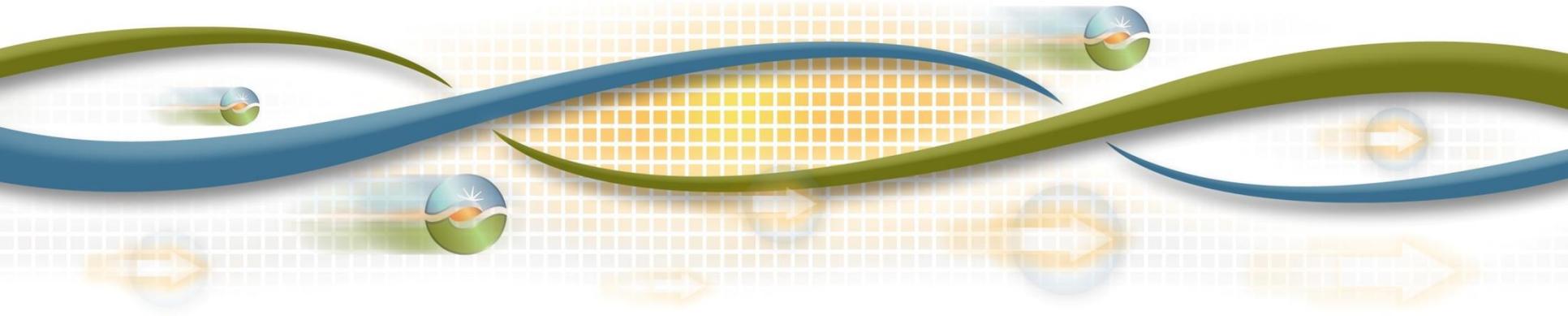




Comments on DMM's presentation CRR Auction Efficiency - Stakeholder Working Group

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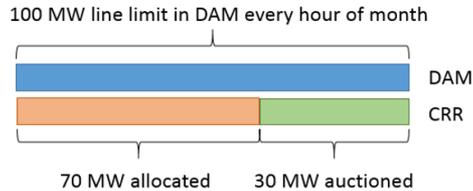


DMM's assertions about CRR revenue adequacy and CRR payments are based on an incomplete characterization of the CRR fundamentals

- Yes, a correlation between revenue adequacy and CRR profits is obvious to be expected
- Whether these variables have a weak or strong correlation and whether their correlation is positive or negative is far from obvious.
- Revenue adequacy and CRR profits are dependent on more variables than just auctioned CRRs and DAM prices.

DMM's presentation dismisses the report's findings on the impact of market misalignments

Achieving "revenue adequacy" implies nothing about ratepayer losses from auction



• Revenue adequacy_k:

$$\sum_h (Price_{k,h}^{DAM} * (100 MW_{k,h}^{DAM} - 100 MW_k^{CRR(auctioned+allocated)}))$$

– Perfectly revenue adequate

• Ratepayer profits from auction_k:

$$30 MW_k^{CRR(auctioned)} * (Price_k^{Auction} - \sum_h Price_{k,h}^{DAM})$$

• Attempting to match CRR model to day-ahead market model:

- Important for *allocated* CRRs
- Misguided for *auctioned* CRRs

- Let's use index k to define the set of [transmission] lines
- $100 MW_k^{DAM}$ should actually be just 100
- $100 MW_k^{CRR(auctioned+allocated)}$ should actually be just 100
- $MW_k^{CRR(auctioned+allocated)}$ needs to be $MW_k^{allocation} + MW_k^{auction}$
- "adequacy_k" should read "adequacy for line k"
- "auction_k" should read "auction from line k"
- Let's differentiate variables from parameters

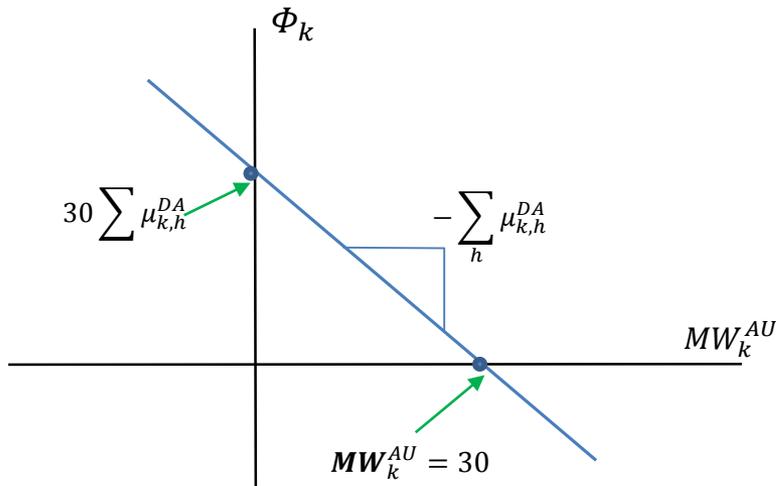
Let's use the very same DMM's formulation as the starting point and as a first step let's clean it up based on the intended example

Alignment between markets means indeed a lot for both revenue adequacy and CRR profits

- Revenue adequacy

$$\Phi_k = \sum_h \mu_{k,h}^{DA} (100 - 70 - MW_k^{AU})$$

$$\Phi_k = \sum_h \mu_{k,h}^{DA} (30 - MW_k^{AU})$$

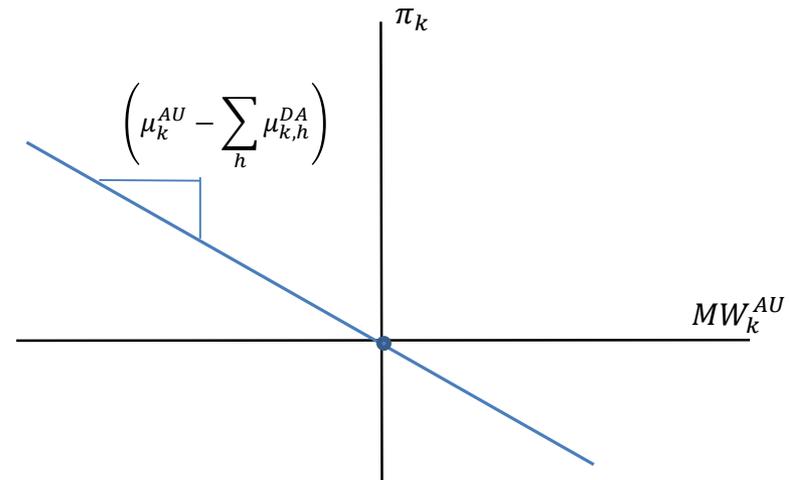


If $\lim_{MW_k^{AU} \rightarrow 30} \Phi_k = 0$

then revenue adequacy is attained, regardless of the DA prices cleared.

- CRR profits

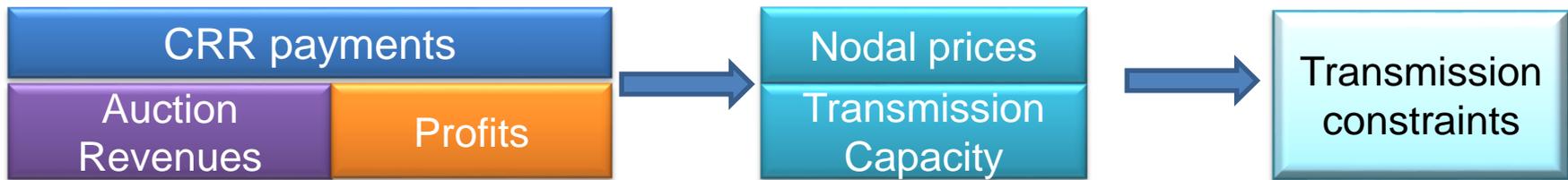
$$\Pi_k = MW_k^{AU} (\mu_k^{AU} - \sum_h \mu_{k,h}^{DA})$$



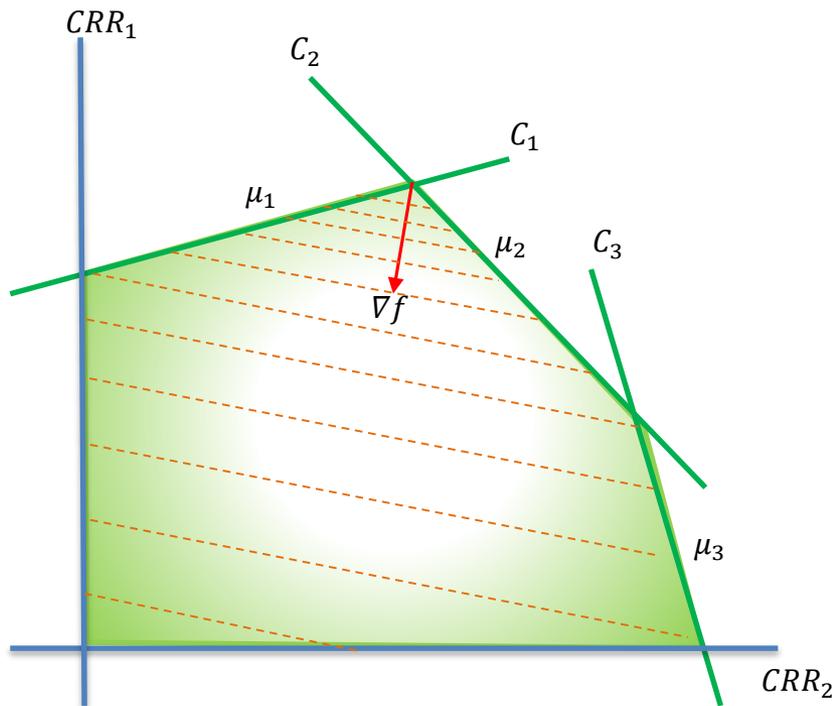
If $\lim_{\mu_k^{AU} \rightarrow \sum_h \mu_{k,h}^{DA}} \pi_k = 0$

then profit neutrality is attained, regardless of the CRR capacity cleared.

Fundamental variables of CRR profits



Congestion Rents and Auction Revenues have same fundamental variables



Auction revenues are derived from the basis of the solution:
Capacity released and constraint prices

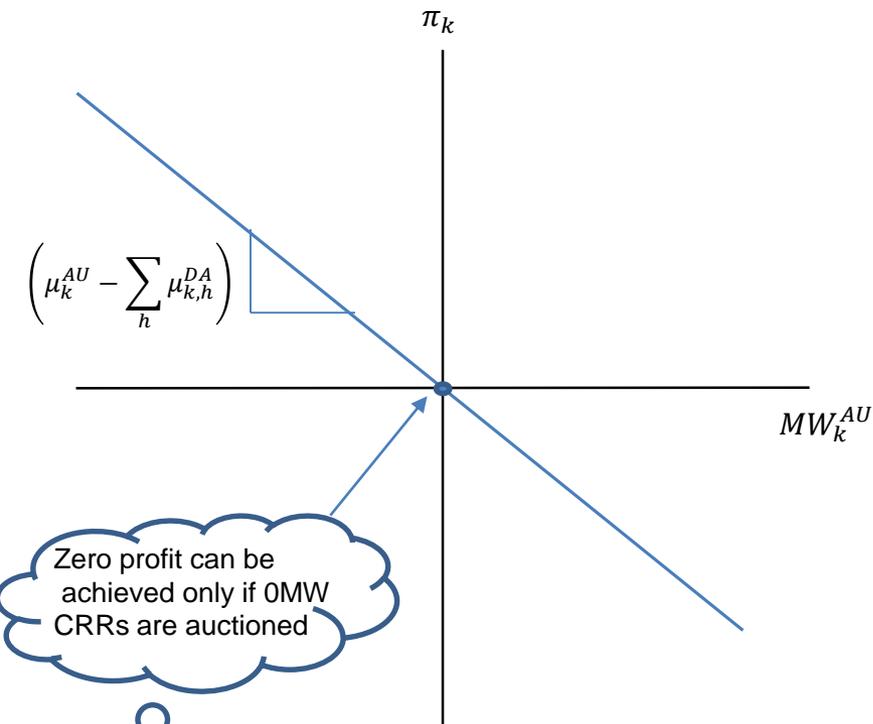
$$AR = \sum C_i \mu_i$$

CRR payments are derived from congestion rents, which are derived from the basis of the DAM solution:

Capacity released and constraint prices

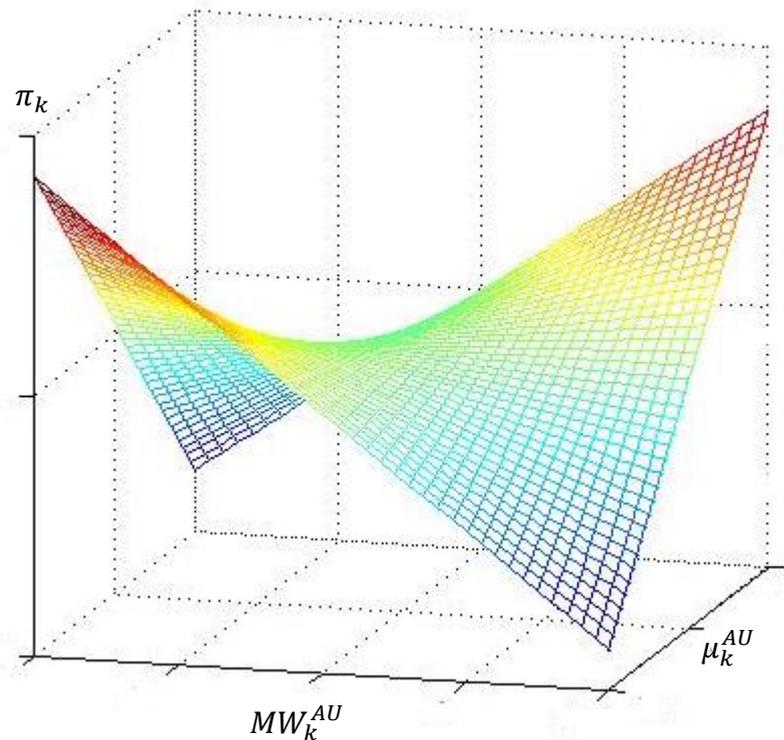
$$CR = \sum C_j \mu_j$$

DMM's conclusions misguide the discussion by stating that alignment between markets is only important for revenue adequacy but not for CRR profits



Zero profit can be achieved only if OMW CRRs are auctioned

DMM's incomplete dimension of the impact of misalignment between markets



More reflective dimension of the impact of misalignment between markets