



Stakeholder Comments Template

Pseudo-Ties of Shared Resources

This template has been created for submission of stakeholder comments on the Issue Paper and Straw Proposal, and the associated May 14 meeting discussion, for the Pseudo-Ties of Shared Resources initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. **Submissions are requested by close of business May 29, 2020.**

Submitted by	Organization	Date Submitted
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Please provide your organization's general comments on the following issues and answers to specific requests.

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.

- LADWP recognizes the need for the Protocol Administrator (single point of contact), on behalf of the Pseudo-Tie PGA owners to provide telemetry signals to CAISO that represent separate output values for each Pseudo-Tie PGA owner, and will coordinate a logical metering procedure. However, CAISO states that dispatch instructions will be issued to each dispatch share of the resource participating in EIM and separate dispatch instructions to each share that participates in the CAISO real-time market. For ease of operation the dispatch instructions should also be simultaneously shared with the designated Scheduling Coordinator so there is a single point of contact for unit dispatch. Otherwise multiple parties need to handle and pass on the dispatch instruction to the Generating Unit.
- LADWP recognizes that the proposed enhancements do not allow for modeling of joint ownership or multi-configurations of the shared resources and welcomes CAISO's more comprehensive development of enhanced functionality to address current market limitations for shared resources in a future jointly-owned unit modeling enhancements initiative. That said, LADWP would ask CAISO to provide

examples of how they expect a forbidden region, or a configuration change for a multi-stage generator, to be respected, particularly as CAISO states the “Protocol Administrator must ensure that operate the resource output is consistent with the CAISO dispatch instruction.”

- CAISO states: “The SQMD Plan should reflect an expectation for partial resources that metering will reflect and follow the dispatch instruction to extent feasible, clearly explain how deviations will be handled, and account for the outage allocation methodology”. LADWP respectfully requests that CAISO clarify whether the outage allocation methodology should be part of the SQMD Plan or the Shared Resource Allocation Protocol.
- LADWP respectfully requests that CAISO provide minimum general requirements or examples of acceptable metering and telemetry requirements, specified in the Protocol. It would also be helpful if CAISO provided examples of insufficient or unacceptable requirements, such as metering rules that allow for manipulation or telemetry rules that do not address all operating points or dispatch instructions.

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.

- CAISO states: “The Pseudo-Tie PGA owners’ Scheduling Coordinators will submit separate outage cards for their shared pseudo-tied resource”. LADWP recognizes the obligation for submitting outages ordinarily has to be on the Pseudo-Tie PGA owners’ SCs for their pseudo tied share. However, with multiple owners there could be timing delays associated with outage submittals leading to disproportionate outages and infeasible dispatches. LADWP respectfully requests that the option of having the designated Scheduling Coordinator submit the physical outage(s) and respective logical share be explored or at a minimum, some mechanism be put in place to prevent issues with timing delays that lead to infeasible dispatches.
- The Straw Proposal states: “For efficiency of the associated business processes, it will be preferable for an enforcement mechanism to include an auditable self-monitoring compliance mechanism, such as submitting a report to CAISO twice per year noting how all outages have been allocated and reported, including explanations of any non-proportional allocation of outages between the shares.” LADWP would like to better understand the need for the reporting and is concerned it may be overly onerous to report on all outages twice per year.
- LADWP respectfully requests that CAISO provide minimum general requirements or examples of acceptable auditable self-monitoring compliance reporting requirements specified in the Protocol, as well as examples of insufficient or unacceptable requirements.

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.

- CAISO gave the following example in the initiative footnotes: "The cost allocation may be relatively simple in a case like two owners with equal shares of a 2x1 combined cycle generator. A different instance could be a generator where one owner has 10% of its capacity, another owns 90%, and the minimum load is 20% of the total capacity. The owners would agree and document between themselves how to allocate the start-up and minimum load costs, with a potential allocation being 100% to the majority owner and the minor owner being unable to bid unless the generator is already running." LADWP is supportive of minority owners being unable to bid unless the generator is running.
- LADWP respectfully requests that CAISO provide minimum general requirements or examples of acceptable treatment of minimum load and start-up costs specified in the Protocol, as well as examples of insufficient or unacceptable requirements.

4. Additional comments

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

- LADWP appreciates that many details of the Protocol may be resource specific. However, we respectfully request that CAISO establish a framework for evaluating draft Shared Resource Allocation Protocols, such as minimum requirements or general test scenarios and criteria for passing.
- Ultimately, LADWP is very supportive and appreciative of CAISO's recognition of various challenges faced by LADWP and other utilities in effectively and efficiently participating in the EIM. CAISO's initiative on Pseudo-Ties of Shared Resources is a significant step in the right direction in continuing to improve the mechanics of EIM participation.