



## Stakeholder Comments Template

### Intertie Deviation Settlement: Draft Final Proposal

This template has been created for submission of stakeholder comments on the Intertie Deviation Settlement Draft Final Proposal that was published on December 13, 2018. The Intertie Deviation Settlement Draft Final Proposal stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/IntertieDeviationSettlement.aspx>

Submitted by	Organization	Date Submitted
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Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com).

Submissions are requested by close of business on **January 8, 2019**.

#### Please provide your organization's comments on the following topics:

1. Curtailed E-Tags will be excluded from the under/over delivery charge, which allows for removal of the 10% threshold.

**MSCG supports this proposal.**

2. The under/over delivery charge will be evaluated in each fifteen-minute interval as opposed to the decline charge, which is applied on a monthly basis.

**MSCG supports this proposal**

3. The logic for the 15-minute market (FMM) will be based on the submission of an E-Tag transmission profile instead of the assumption that an E-Tag will be submitted.

**We appreciate the CAISO considering market participant feedback throughout this stakeholder process.**

MSCG believes that if a market participant confirms the award by T-45 in ADS and is penalized sufficiently if they do not deliver, those proposed changes alone should adequately reduce the deviations on intertie awards. We feel the timing change on accepting ADS awards to T-45 combined with the increased penalties will largely solve the deviation problem and requiring an eTag with a transmission profile by T-40 may unnecessarily exacerbate seams issues.

If CAISO does ultimately proceed with the T-40 eTag deadline, MSCG would like to suggest the following:

- a. Make T-40 (or any future updated time) a deadline to clear in the 1<sup>st</sup> 15 minute FMM interval. Make T-22.5 a deadline to clear in the 2<sup>nd</sup> 15 minute interval.
  - b. Please clarify if an hourly block eTag is submitted past T-40 to match an award but prior to T-20, the eTag will not be curtailed if there is sufficient intertie space and the cleared volume for the corresponding interval that is past CAISO deadlines will settle at the RTD.
4. Declined and undelivered energy will be subject to the under/over delivery charge =  $0.5 \times \text{MAX}(\text{FMM LMP}, \text{RTD LMP})$ , with a \$10/MWh minimum

MSCG supports this proposal

### Additional comments

Please offer any other feedback your organization would like to provide on the Intertie Deviation Settlement Draft Final Proposal.

Can CAISO clarify why the deadline for the second interval is not T-22.5 rather than T-40 as per the examples?