

**Western Power Trading Forum Comments on DOT Initiative Draft Tariff Language**  
Carrie Bentley [Cbentley@gridwellconsulting.com](mailto:Cbentley@gridwellconsulting.com)

## Summary

WPTF appreciates the CAISO's patience and diligence in taking the time to understand our concerns with the tariff language and overall policy. WPTF believes there are three topics that are important to discuss within the context of the tariff language changes;

1. Obligations for resources, including Eligible Intermittent Resources (EIRs) to follow their DOT under different circumstances
2. Practices and processes for the CAISO to issue lengthy Operating Instructions to EIRs and how these differ from exceptional dispatches
3. Transparency on curtailments due to Operating Instructions

## Comments

**1. Obligations for resources to follow their DOT under different circumstances.** WPTF appreciates the changes to the proposed tariff language and has inserted proposed comments and redlines on the proposed tariff language in a separate document.

**2. Practices and processes for the CAISO to issue lengthy Operating Instructions to VERs.** WPTF appreciates the additional clarifications surrounding Operating Instructions in the tariff. On the last tariff call, on April 13, many stakeholders gave the impression that several recent Operating Instructions were out-of-step with tariff requirements surrounding when the CAISO has authority to obtain supervisory control over Generating Units. Participants referred to several recent days where Operators issued day-long Operating Instructions to EIRs to follow their DOTs while they concurrently had economic offers in the market place that were not taken. No system emergency was called, and so participants stated they were under the impression that tariff section 7.6 governed the CAISO's ability to issue Operating Instructions.

WPTF observes that this disconnect does seem to be continued in the proposed tariff language as the CAISO proposes the following language which directly refers to 7.6,

*Notwithstanding the above, the CAISO may issue an Operating Instruction directing the Eligible Intermittent Resource not to exceed its Dispatch Operating Target if necessary to maintain system reliability consistent with Sections 7.6 or 7.7 of the CAISO tariff*

Section 7.6 indicates that in order for the CAISO to give Operating Instructions, not only is it expected that, "the operational circumstances will be so severe that a Real-Time system problem or emergency condition could be in existence or imminent" but also that,

*Only when the CAISO has used the Energy and Ancillary Services that are available to it under such Energy and Ancillary Services Bids which prove to be effective in responding to the problem and the CAISO is still in need of additional control over Generating Units, shall the CAISO assume supervisory control over other Generating Units.*

WPTF therefore asks the CAISO to clarify the Operating Instruction process and provide additional detail to participants on when the CAISO will rely on each curtailment tool; economic, self-schedule, exceptional dispatch, and operating instruction.

**3. Transparency on curtailments due to Operating Instructions.** WPTF believes that the amount of renewable energy reduced through Operating Instructions is significant enough to warrant tracking in a transparent manner. Along with economic, self-schedule, or exceptional dispatch curtailment, the CAISO should add “operating instruction” curtailment into the CAISO’s renewable reports, monthly reporting, and Market Performance and Planning meetings.

WPTF appreciates the CAISO’s consideration of these comments.