

3Background:

This document provides an opportunity for interested stakeholders to submit informal comments and perspectives on various topics discussed during the working group process. There is recognition that additional details are needed on these topics that will be developed throughout the initiative, and stakeholders will have opportunities to provide more comprehensive and formalized comments on these topics to the extent these become part of a formal proposal. Please be brief in any written responses to facilitate review, recognizing these represent informal reactions at this early stage.

Please submit your comments using this template to ISOStakeholderAffairs@caiso.com by end of day March 14, 2022.

Question:

For each question please identify whether you “generally support”, are “neutral” or “generally oppose” the concepts based on the information discussed in the working groups to date, recognizing that additional detail will be provided through the straw that will allow you to consider the concepts in a more complete light. If desired, please provide additional context and/or identify additional aspects for consideration.

1. Please share your perspective on the transmission “buckets” framework for supporting EDAM transfers.
 - Generally support
 - Neutral
 - Generally oppose

Comments:

WAPA reserves further comments based on the initial straw proposal.

2. Please share your perspective on whether Bucket 2 transmission should, aside from the voluntary nature of it, include use of unscheduled point-to-point transmission to maximize transmission available to EDAM for optimization of transfers.
 - Generally support
 - Neutral
 - Generally oppose

Comments

WAPA generally supports the use of unscheduled point to point transmission but only supports use of unscheduled point to point transmission based upon a voluntary release of transmission by the transmission rights holder.

3. Please share your perspective on the concept of the CAISO providing hurdle free transmission in the export direction reciprocal to the amount of hurdle free transmission provided by the adjoining EDAM BAA across the interface to support EDAM transfers and derive mutual benefit.
- Generally support
 - Neutral
 - Generally oppose

Comments:

WAPA currently has no opinion at this time. WAPA would appreciate further clarification from the ISO on which buckets this would apply to. Upon clarification, we will review the contractual and legal ramifications.

4. Please share your perspective on the overall transmission compensation framework under the transmission buckets and the associated transfer revenue and congestion rent allocation method discussed:
- A. Congestion rents is associated with internal transmission within the EDAM Entity that is a component of the Locational Marginal Price. Transfer revenue, includes the congestion rent, and is the LMP difference between the import and export transfer. Transfer revenue may also include the hurdle rate depending upon the product.
- Generally support
 - Neutral
 - Generally oppose

Comments:

WAPA would appreciate clarification regarding internal transmission within the EDAM Entity and additional examples beyond what has been covered to date for transmission between EDAM entities in the working groups. WAPA is supportive that the transmission owner should be appropriately compensated for the use of the internal EDAM optimized transmission.

- B. Transfer revenue associated with EDAM transfers between EDAM BAAs are generally divided 50/50 between these BAAs.
- Generally support
 - Neutral

Generally oppose

Comments:

WAPA believes transmission revenue allocation should be proportional to the transmission rights made available by the right-holders. WAPA would appreciate further discussion and additional examples regarding this topic.

- C. Transfer revenue associated with EDAM Transfers across an Intertie Constraint (ITC) at the boundary with the CAISO are allocated 100% to the CAISO or adjoining EDAM BAA depending upon the location of the congestion (if on the CAISO side or the adjoining EDAM BAA side).

Generally support

Neutral

Generally oppose

Comments:

WAPA believes transmission revenue allocation should be proportional to the transmission rights made available by the right-holders.

5. Please share your perspective on intertie bidding:

- A. Self-schedules should continue to be permitted at the interfaces with the EDAM footprint

Generally support

Neutral

Generally oppose

Comments:

- B. Economic bidding is not permitted at interties on the boundary of the EDAM footprint, except at CAISO interties with non-EDAM BAAs.

Generally support

Neutral



EDAM WG 2: Transmission Commitment and Congestion Revenue Rents
Template for Informal Comments

Generally oppose

Comments: