

## California Department of Water Resources - State Water Project Comments on Revised FERC Order No. 764 Draft Tariff Language

November 12, 2013

On October 30, 2013, the CAISO issued the Revised FERC Order No. 764 Draft Tariff Language. A subsequent web conference was held on November 6, 2013 to discuss the changes.

The following are the DWR's comments on the Revised FERC Order 764 Draft Tariff Language

### 1. Section 6.5.4.1.5 – 1<sup>st</sup> line

No later than forty (40) minutes before the Trading Hour, on an hourly basis, the CAISO

Time conflicts with time noted in section 34.2.4, which says 45 minutes. Time should be confirmed and should be the same in both sections.

### 2. Section 34 – lines 12 – 13

processes: 1) accepting Self-Schedule Hourly Blocks for Energy and Ancillary Services, 2) accepting VER Self-Schedules for Energy, 3) optimizing Economic Hourly Block Bids for Energy

It seems like there are steps missing in between (2) and (3). Steps (1) and (2) accept the respective self-scheduled bids. But then in steps (3) and (4), HASP optimizes the respective economic hourly block bids. In between steps (2) and (3), there should be two additional steps to accept the economic hourly block bids for energy and AS and the economic hourly block bids with an intra-hour option. If steps are added, the last sentence in this same paragraph should also be updated.

### 3. Section 34 – line 16

and 5) providing purely advisory FMM Energy schedules and Ancillary Services awards and

Using "FMM" makes it sound like the FMM provides advisory schedules and awards, which is not the case. Proposed language:

and 5) providing purely advisory 15-min Energy schedules and Ancillary Services awards and

## 4. Section 34 – 6<sup>th</sup> paragraphs, last sentence (near the bottom of pg 133)

Dispatch Instructions. In any given Trading Hour, the STUC may commit resources for the third fifteen-minute interval of the current Trading Hour and extending into the next **four (4)** Trading Hours.

Time conflicts with time noted in section 34.3, which says 3 hours. Time should be confirmed and should be the same in both sections.

## 5. Section 34.2

This section should be updated to reflect any changes made to section 34.

## 6. Section 34.2.2 – lines 1 – 2

The HASP optimization does not adjust submitted Self-Schedules or Self-Provided Hourly Blocks, or Self-Scheduled Variable Energy Resources unless it is not possible to balance Supply and the

HASP optimization does not adjust (a) self-schedules, (b) self-provided hourly blocks, or (c) self-scheduled VERs unless...

Based on the first summary page of these tariff changes, there are six type of RTM bids.

*Bids to RTM can take the following form:*

- (1) *Economic Bids (for internal and Intertie transactions)*
- (2) *Self-Schedule (for internal and Intertie transactions)*
- (3) *Self-Schedule Hourly Block (for Intertie transactions only)*
- (4) *VER Self-Schedule (for VERs outside the ISO BAA)*
- (5) *Economic Hourly Block Bid (for Intertie transactions only)*
- (6) *Economic Hourly Block Bid with Intra-Hour Option (for Intertie transactions only)*

Is it correct to say that (2) = (a), (3) = (b), and (4) = (c)?

Is yes, shouldn't the acceptance of self-schedules, (2), be listed as a process in HASP, in section 34 (this is part of the same list referenced in comment #2)?

## 7. Section 34.3.2 – lines 1 – 2

If the CAISO determines that additional Ancillary Services are required, other than those procured in the IFM, HASP, the FMM will procure Ancillary Services on a fifteen (15) minute basis as

Recommend the following for clarity:

If the CAISO determines that additional Ancillary Services are required, other than those procured in the IFM or HASP, the FMM will procure Ancillary Services on a fifteen (15) minute basis as

## 8. Section 39.7 – lines 3 – 4

power mitigation processes are described in Section 31.2 for the DAM and Sections 34.1.2.3 and 34.3.3 for the RTM.

The two sections referenced above do not exist. Should 34.1.2.3 be 34.1.3?