

# Comments on the Generator Contingency & RAS Modeling – Revised Issue Paper & Straw Proposal

Department of Market Monitoring  
December 1, 2016

The California ISO Department of Market Monitoring (DMM) appreciates this opportunity to comment on the ISO's Generator Contingency & RAS Modeling Revised Issue Paper & Straw Proposal (Straw Proposal).<sup>1</sup> DMM worked with the ISO as they developed the Straw Proposal and supports the direction the ISO has taken and the clearer framing of the initiative objectives.

The initiative objectives are to:

1. Recognize the increased transmission capability benefits from Remedial Action Schemes (RAS) in the market while protecting the transmission system during RAS events;
2. Dispatch generation such that transmission lines will not overload during a generator contingency or RAS event; and
3. Price the contribution to congestion for generators on RAS and generators not on RAS.

The ISO proposes modeling preventive transmission constraints with the shift factor of RAS/contingency generators changed to a generator flow factor. The generator flow factor accounts for generator and system conditions during a RAS/contingency event. The proposed preventive modeling is very similar to current preventive transmission contingency modeling and follows directly from the ISO's objectives. The proposed congestion pricing is simply an application of the current congestion pricing but recognizes that the RAS/contingency generators will be disconnected during the RAS/contingency events.

Because the proposed congestion pricing is basically the same as current congestion pricing, there is no need to update local market power mitigation. The RAS/generator contingency constraints can be treated like current transmission constraints with the shift factors replaced by generator flow factors where needed.

DMM looks forward to continued engagement with the ISO and stakeholders as this initiative progresses.

---

<sup>1</sup> See *Generator Contingency & RAS Modeling – Revised Issue Paper & Straw Proposal*, November 7, 2016: [http://www.caiso.com/Documents/RevisedIssuePaper\\_StrawProposal\\_GeneratorContingency\\_RemedialActionSchemeModeling.pdf](http://www.caiso.com/Documents/RevisedIssuePaper_StrawProposal_GeneratorContingency_RemedialActionSchemeModeling.pdf).