

January 20, 2023

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket No. ER15-861-____
Western Energy Imbalance Market – Third Quarter 2022
Available Balancing Capacity Report**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its quarterly informational report for the fourth quarter of 2022 (October 1 to December 31, 2022) on the Available Balancing Capacity (ABC) enhancement for the Western Energy Imbalance Market (WEIM). The quarterly informational report is to provide the Commission with information on the performance of the ABC enhancement and to provide the same information the CAISO provides in its monthly informational reports submitted during a WEIM Entity's first six-month transition period.

Consistent with the Commission's directive in the December 17, 2015 order, the CAISO will continue to file such quarterly reports for at least the first year after implementation of the ABC enhancement, or until the Commission finds the quarterly informational reports are no longer needed.

Please contact the undersigned with any questions.

Respectfully submitted

By: /s/ John Anders

Roger E. Collanton
General Counsel
John Anders
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7182
Fax: (916) 608-7222
janders@caiso.com



California ISO

Western Energy Imbalance Market

October 1 – December 31, 2022

Available Balancing Capacity Report

January 20, 2023

Table of Contents

I.	Background	3
II.	Available Balancing Capacity	4
	A. ABC Submitted to the Market	4
	B. ABC Awarded by the Market.....	7
	C. ABC and Power Balance Constraint Infeasibilities.....	8
III.	WEIM Performance	11
	A. ELAP Prices.....	11
	B. Balancing Test Failures	12
	C. Flexible Ramp Sufficiency Test Failures	14

I. Background

On December 17, 2015, the Federal Energy Regulatory Commission (Commission) approved the California Independent System Operator Corporation's (CAISO) proposed tariff revisions to comply with the Commission's July 20, 2015 order in FERC Docket No. ER15-861-006.¹ The CAISO's proposed tariff provisions enhanced the Western Energy Imbalance Market (WEIM) functionality so that the market systems automatically recognize and account for capacity a WEIM entity has available to maintain reliable operations in its own balancing authority area (BAA), but has not been bid into the WEIM.² This enhancement is referred to as the Available Balancing Capacity (ABC) enhancement. The CAISO implemented the ABC enhancement on March 23, 2016.

Consistent with the CAISO's commitments made in this proceeding, the Commission directed the CAISO to prepare and file with the Commission quarterly informational reports for at least the first year after implementation of the ABC enhancement, and until the Commission finds the quarterly informational reports are no longer needed.³ The quarterly informational reports are to provide information on the performance of the ABC enhancement and to include the same information the CAISO provides in its monthly transitional period report submitted during a WEIM entity's first six-month transition period.⁴ For 2022, these transitional period reports are available until October 2022.

¹ *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,060 (2015) (July 20 Order); and *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61, 305 (2015) (December 17 Order).

² December 17 Order at P 1.

³ December 17 Order at P 99

⁴ December 17 Order at P 39.

II. Available Balancing Capacity

A. ABC Submitted to the Market

Each WEIM entity can identify and choose the amount of Available Balancing Capacity (ABC) they will make available to the CAISO and the resources supporting this capacity through its resource plan. The WEIM entity submits this capacity to the CAISO on an hourly basis, and it is available for both the Fifteen-Minute Market (FMM) and the five-minute Real-Time Dispatch (RTD). The data in this section shows the ABC bid into, and awarded by, the market in each of the WEIM BAAs for each month within the quarter.

The table below summarizes the percentage of hours in which each WEIM entity submitted upward and downward ABC bids to the WEIM for each month within the quarter. Many entities submitted ABC for nearly all intervals in each month with some exceptions. Idaho Power Company (IPCO) and Seattle City Light (SCL) did not submit any ABC to the WEIM during the quarter.

Table 1: Frequency of ABC Submitted to the WEIM

BAA	October 2022		November 2022		December 2022	
	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity
AVA	99.87%	100.00%	100.00%	99.86%	100.00%	100.00%
AZPS	97.85%	96.24%	95.01%	95.56%	96.51%	97.58%
BANC	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
BCHA	99.60%	100.00%	99.31%	100.00%	99.33%	100.00%
BPA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
IPCO	--	--	--	--	--	--
LADWP	1.21%	2.42%	1.80%	3.19%	1.21%	0.13%
NEVP	98.66%	93.95%	99.17%	91.26%	99.87%	94.76%
NWMT	100.00%	99.87%	99.72%	99.58%	88.58%	97.31%
PACE	10.62%	--	13.73%	67.68%	6.45%	40.86%
PACW	2.69%	--	2.77%	0.28%	1.48%	--
PGE	99.73%	--	100.00%	--	99.60%	--
PNM	0.54%	81.32%	0.28%	54.51%	1.21%	68.95%
PSEI	--	0.67%	0.42%	0.28%	--	4.30%
SCL	--	--	--	--	--	--
SRP	100.00%	95.97%	100.00%	99.17%	99.87%	100.00%
TEP	100.00%	99.73%	100.00%	99.72%	99.87%	99.73%
TIDC	100.00%	100.00%	99.86%	99.86%	100.00%	99.87%
TPWR	96.10%	93.55%	99.58%	100.00%	98.93%	98.93%

The table below shows the average ABC capacity, in MW, which each WEIM entity submitted to the WEIM for each month within the quarter. BCHA consistently submitted the highest average ABC capacity to the WEIM in both the upward and

downward directions.

Table 2: Average ABC Capacity Submitted to the WEIM

BAA	October 2022		November 2022		December 2022	
	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)
AVA	20	20	20	20	20	20
AZPS	19.98	20	19.99	20.04	20.01	20.04
BANC	12.59	17.54	11.28	16.98	11.22	16.7
BCHA	643.3	299.49	571.6	300	554.91	300
BPA	154.5	163.52	152.8	161.71	154.4	163.06
IPCO	--	--	--	--	--	--
LADWP	31.89	95	42.92	48.5	49.67	46
NEVP	22.45	29.84	23.48	32.7	22.31	31.41
NWMT	5	5	5.12	5	5	5
PACE	20.34	--	20.41	86.06	8.96	90
PACW	30.25	--	27.5	130	18.64	--
PGE	16.98	--	17.41	--	26.59	--
PNM	12.5	31.61	13.75	36.32	41.11	40.95
PSEI	--	41	21.83	35	--	41.53
SCL	--	--	--	--	--	--
SRP	25.03	26.31	25.26	17.97	28.5	17.35
TEP	12.49	17.99	13.56	21.07	15.45	18.5
TIDC	15	5	14.79	5	13.18	5
TPWR	1.44	1.71	1.4	1.72	1.58	1.98

The table below shows the maximum ABC capacity, in MW, which each WEIM entity submitted to the WEIM for each month within the quarter. The highest ABC bid was submitted by BCHA in the upward direction for 1000 MW, which was consistent across all three months of the quarter.

Table 3: Maximum ABC Capacity Submitted to the WEIM

BAA	October 2022		November 2022		December 2022	
	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)
AVA	20	20	20	20	20	20
AZPS	20	20	20	53	50	56
BANC	75	94	55	62	51	89
BCHA	1000	500	1000	500	1000	500
BPA	268	314	263	278	294	311
IPCO	--	--	--	--	--	--

BAA	October 2022		November 2022		December 2022	
	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)	Upward Capacity (MW)	Downward Capacity (MW)
LADWP	75	140	75	50	150	46
NEVP	40	60	40	40	55	40
NWMT	5	5	50	5	5	5
PACE	50	--	100	120	30	90
PACW	40	--	30	130	25	--
PGE	30	--	22	--	35	--
PNM	20	75	40	80	50	80
PSEI	--	50	56	35	--	46
SCL	--	--	--	--	--	--
SRP	100	50	100	50	100	50
TEP	45	44	50	35	75	40
TIDC	15	5	15	5	15	5
TPWR	3	4	2	3.4	4	3.4

The table below shows the number of different resources supporting the ABC that the WEIM entities bid into the WEIM in both the upward and downward directions, for each month within the quarter. A maximum of 21 resources supported upward ABC capacity bids submitted by SRP. Some entities used as few as one resource to support their ABC bids.

Table 4: Number of Resources Supporting ABC

BAA	October 2022		November 2022		December 2022	
	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity
AVA	8	8	8	8	7	7
AZPS	5	5	4	5	3	3
BANC	15	13	11	13	13	15
BCHA	2	2	2	2	2	2
BPA	2	2	3	3	3	3
IPCO	--	--	--	--	--	--
LADWP	3	6	2	3	3	1
NEVP	10	11	10	9	11	12
NWMT	5	5	3	3	3	3
PACE	8	--	5	6	3	3
PACW	1	--	1	1	2	--
PGE	4	--	2	--	5	--
PNM	2	9	4	8	2	8
PSEI	--	1	2	1	--	2
SCL	--	--	--	--	--	--
SRP	21	16	17	13	16	13
TEP	12	15	15	15	19	12

BAA	October 2022		November 2022		December 2022	
	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity
TIDC	1	1	2	2	2	2
TPWR	5	6	5	5	5	5

B. ABC Awarded by the Market

The table below shows the frequency of each WEIM entities' dispatched ABC for the FMM market, when the WEIM entities made ABC available, for each month within the quarter. Overall, the market dispatched ABC quite infrequently throughout the quarter. The highest frequency of ABC dispatch in FMM occurred in December 2022 for SRP's bid-in downward ABC capacity. Often, the market dispatched ABC around or less than 1 percent of the time during the month.

Table 5: Frequency of ABC Dispatched by WEIM in the FMM

BAA	October 2022		November 2022		December 2022	
	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity
AVA	--	0.10%	--	--	--	0.03%
AZPS	--	--	0.14%	--	0.03%	--
BANC	--	--	--	--	--	0.03%
BCHA	--	--	--	--	--	--
BPA	0.17%	--	0.07%	0.10%	0.30%	0.03%
IPCO	--	--	--	--	--	--
LADWP	--	--	--	--	--	--
NEVP	0.10%	0.71%	0.04%	0.24%	--	0.74%
NWMT	--	--	0.14%	--	0.03%	--
PACE	--	--	--	--	--	--
PACW	--	--	--	--	--	--
PGE	--	--	0.24%	--	--	--
PNM	--	3.93%	--	2.39%	--	3.26%
PSEI	--	--	--	--	--	--
SCL	--	--	--	--	--	--
SRP	2.42%	2.22%	1.73%	1.53%	2.62%	6.96%
TEP	--	--	--	--	--	--
TIDC	--	--	--	--	0.27%	--
TPWR	--	--	--	--	--	0.03%

The table below shows the frequency of each WEIM entities' dispatched ABC for the RTD market, when the WEIM entities made ABC available, for each month within the quarter. Overall, the market dispatched ABC infrequently throughout the quarter. The highest frequency of ABC dispatch in RTD occurred in December 2022 on SRP's

bid-in downward ABC capacity. Often, the market dispatched ABC less than or around 1 percent of the time during the month.

Table 6: Frequency of ABC Dispatched by WEIM in the RTD

BAA	October 2022		November 2022		December 2022	
	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity	Upward Capacity	Downward Capacity
AVA	0.10%	0.16%	0.01%	--	0.12%	0.03%
AZPS	0.10%	0.09%	0.31%	0.31%	0.13%	--
BANC	0.08%	0.08%	0.19%	0.22%	0.15%	0.18%
BCHA	--	0.20%	0.12%	0.02%	--	0.06%
BPA	0.01%	--	0.09%	0.07%	0.25%	0.27%
IPCO	--	--	--	--	--	--
LADWP	--	--	--	--	--	--
NEVP	0.36%	0.38%	0.09%	0.38%	0.30%	0.22%
NWMT	0.12%	0.01%	0.44%	--	0.13%	--
PACE	--	--	--	0.01%	--	0.03%
PACW	--	--	--	--	--	--
PGE	0.09%	--	0.19%	--	--	--
PNM	--	2.44%	--	1.66%	0.05%	2.58%
PSEI	--	--	--	--	--	0.02%
SCL	--	--	--	--	--	--
SRP	2.04%	1.52%	1.39%	2.09%	3.16%	5.57%
TEP	--	--	--	--	--	--
TIDC	--	--	0.10%	0.10%	0.63%	--
TPWR	--	0.10%	0.04%	0.01%	--	--

C. ABC and Power Balance Constraint Infeasibilities

The purpose of the ABC enhancement is to make capacity available that otherwise would not be visible to the WEIM. The primary objective in making such capacity available is that the WEIM can recognize and access that capacity when the conditions warrant its use, namely when the WEIM is running out of capacity made available through economic bids. The ABC is capacity stacked above economic bids, but below the power balance constraint relaxation penalty price. When the market is tight in supply and it has exhausted all effective economic bids, the market clearing process will access the ABC. If there is sufficient ABC, the WEIM will relax the power balance constraint to clear the market. As such, the market clearing process uses the ABC to resolve the power balance infeasibility. If instead the ABC identified is not sufficient to cure the infeasibility, the ABC may be exhausted and there may still be the need to relax the power balance constraint in order to clear the WEIM.

The table below shows the frequency of intervals in which the WEIM entities did not make any ABC available to the WEIM, when there was a power balance infeasibility for each month within the quarter, in the FMM. Specifically, the data in the table below

provides the percentage amount of over-supply infeasibilities where downward ABC was needed, and under-supply infeasibilities where upward ABC was needed. No data indicates that there were no infeasibilities during the period. A metric of 0 percent indicates that in all intervals when there was an infeasibility observed, the WEIM entity did submit ABC to the WEIM. A metric of 100 percent indicates that in all intervals when there was an infeasibility observed, the WEIM entity did not submit any ABC to the WEIM. These instances occurred relatively infrequently throughout the quarter, indicating that the WEIM entities typically had submitted ABC bids during instances when infeasibilities were observed.

Table 7: Frequency of Power Balance Infeasibilities When no ABC was Available in FMM

BAA	October 2022		November 2022		December 2022	
	Over-supply	Under-supply	Over-supply	Under-supply	Over-supply	Under-supply
AVA	0.00%	--	--	--	--	--
AZPS	100.00%	--	0.00%	--	--	0.00%
BANC	--	--	--	--	--	--
BCHA	--	--	--	--	--	--
BPA	0.00%	0.00%	--	--	--	0.00%
IPCO	--	--	--	--	--	--
LADWP	--	100.00%	--	--	--	--
NEVP	25.00%	--	50.00%	--	--	--
NWMT	--	--	--	0.00%	--	0.00%
PACE	--	--	--	--	--	--
PACW	--	--	--	--	--	--
PGE	--	--	--	0.00%	--	--
PNM	--	100.00%	--	100.00%	--	100.00%
PSEI	--	--	--	--	--	--
SCL	--	--	100.00%	--	100.00%	100.00%
SRP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TEP	--	--	--	--	--	0.00%
TIDC	--	--	--	--	--	--
TPWR	--	--	--	--	--	--

The table below shows the frequency of intervals in which the WEIM entities did not make any ABC available to the WEIM, when there was a power balance infeasibility for each month within the quarter, in the RTD. Instances of observed infeasibilities with no submitted ABC occurred more frequently in RTD than FMM.

Table 8: Frequency of Power Balance Infeasibilities When no ABC was Available in RTD

BAA	October 2022		November 2022		December 2022	
	Over-supply	Under-supply	Over-supply	Under-supply	Over-supply	Under-supply
AVA	0.00%	0.00%	--	--	0.00%	0.00%
AZPS	100.00%	0.00%	14.29%	0.00%	0.00%	33.33%
BANC	--	--	--	--	--	--
BCHA	--	--	--	--	--	--
BPA	0.00%	0.00%	--	0.00%	--	--
IPCO	--	--	--	--	--	--
LADWP	--	100.00%	--	--	--	100.00%
NEVP	25.00%	0.00%	4.35%	0.00%	0.00%	0.00%
NWMT	--	0.00%	--	0.00%	--	32.26%
PACE	--	--	--	--	--	100.00%
PACW	--	--	--	--	--	--
PGE	--	--	--	0.00%	--	--
PNM	--	100.00%	100.00%	100.00%	--	100.00%
PSEI	--	--	--	100.00%	--	--
SCL	--	--	100.00%	100.00%	100.00%	100.00%
SRP	17.14%	0.00%	0.00%	0.00%	0.00%	0.00%
TEP	--	0.00%	--	0.00%	--	0.00%
TIDC	--	--	--	0.00%	0.00%	--
TPWR	0.00%	--	--	--	--	--

III. WEIM Performance

This section provides the information the CAISO previously provided in its monthly transition period report submitted during a WEIM entity's first six-month transition period.

A. ELAP Prices

The figures in this section show the WEIM load aggregation point (ELAP) prices⁵ for the FMM and RTD in each WEIM BAA. In prior reports, the CAISO provided these factual prices in comparison to counterfactual prices in order to show the effect of using the pricing waiver of the price discovery mechanism.⁶

The CAISO may correct prices posted on its Open Access Same-time Information System (OASIS) pursuant to the CAISO's price correction authority in section 35 of the CAISO tariff, if it finds: (1) that the prices were the product of an invalid market solution; or (2) the market solution produced an invalid price due to data input failures, hardware or software failures; or (3) a result that is inconsistent with the CAISO Tariff.

The prices presented in the figures below include all prices produced by the CAISO consistent with the CAISO tariff requirements. That is, the trends below represent: (1) prices as produced in the market for which the CAISO deemed valid; (2) prices that the CAISO could and did correct pursuant to section 35; and (3) any prices the CAISO adjusted pursuant to transition period pricing reflected in section 29.27 of the CAISO tariff.

The table below shows the average ELAP prices for all WEIM entities for each month within the quarter. Prices were generally lower on average throughout the first two months of the quarter and rose to higher than average levels in December 2022 corresponding to the gas price volatility that occurred during the month.

⁵ The ELAP provides aggregate prices that are representative of pricing in the overall BAA.

⁶ In Docket ER15-402, the CAISO reported on prices based on the price discovery mechanism in effect during the term of the Commission's waiver granted in that docket and the prices as they would be if the waiver was not in effect, *i.e.*, what prices would have been had they been on the penalty prices in the CAISO tariff. Because pricing under the waiver pricing is based on the last economic bid price signal, these prices are a proxy of what the prices would have been absent the seven category of learning curve type issues experience in that market. The difference between the counterfactual pricing and the price in effect during the term of the reports in that docket illustrated the market impact of the waiver pricing.

Table 9: Average FMM and RTD ELAP Prices

BAA	October 2022		November 2022		December 2022	
	FMM (\$/MWh)	RTD (\$/MWh)	FMM (\$/MWh)	RTD (\$/MWh)	FMM (\$/MWh)	RTD (\$/MWh)
AVA	64.61	64.1	86.05	83.31	245.56	241.39
AZPS	56.36	54.06	79.64	76.95	250.65	239.84
BANC	75.33	74.27	94.7	92.42	251.89	249.36
BCHA	66.85	64.82	81.85	80.3	211.51	209.39
BPA	65.17	62.9	85.75	83.32	251.29	247.06
IPCO	63.15	61.24	83.66	80.44	237.05	232.55
LADWP	66.66	61.19	86.83	80.52	256.23	243.49
NEVP	57.62	56.85	79.4	76.15	243.22	234.89
NWMT	64.27	63.85	86.7	86.3	243.32	240.42
PACE	59.28	56.8	72.04	69.8	192.89	191.99
PACW	64.43	63.09	84.7	83.01	244	239.33
PGE	64.56	62.58	87.23	84.14	244.11	239.36
PNM	58.48	56.62	64.09	63.26	114.23	122.62
PSEI	64.1	61.65	85.15	83.03	248.77	247.21
SCL	64.21	61.72	85.1	82.35	248.53	246.53
SRP	55.54	51.25	75.67	71.86	157.13	148.92
TEP	57.09	54.2	76.5	72.91	222.21	215.09
TIDC	76.44	76.5	95.38	93.93	266.26	262.68
TPWR	64.14	61.66	85	82.48	248.1	246.36

B. Balancing Test Failures

The CAISO performs the balancing test pursuant to Section 29.34(k) of the CAISO tariff. Powerex (BCHA) is not subject to the balancing test.

The table below shows the frequency that each WEIM entity passed the balancing test, as well as what percentage of balancing test failures were due to under-scheduling and over-scheduling, for each month within the quarter. Overall, the entities passed the balancing test at high frequencies throughout the quarter.

Table 10: Frequency of Passing Balancing Test

BAA	October 2022	November 2022	December 2022
AVA	99.33%	98.75%	99.73%
AZPS	99.06%	98.89%	98.52%
BANC	99.60%	99.86%	100.00%
BCHA	--	--	--
BPA	82.93%	98.75%	97.45%
IPCO	99.87%	99.86%	99.73%
LADWP	99.46%	99.86%	99.19%

BAA	October 2022	November 2022	December 2022
NEVP	97.85%	98.06%	98.92%
NWMT	98.39%	97.92%	97.85%
PACE	98.52%	98.75%	98.66%
PACW	98.52%	98.61%	99.19%
PGE	99.19%	99.17%	98.66%
PNM	96.77%	95.69%	97.31%
PSEI	97.98%	97.50%	97.98%
SCL	100.00%	99.86%	100.00%
SRP	97.85%	98.19%	97.58%
TEP	98.25%	98.19%	97.98%
TIDC	99.87%	99.58%	99.60%
TPWR	99.73%	99.72%	99.60%

The table below shows the frequency of balancing test failures due to over-scheduling and under-scheduling respectively, for each month of the quarter. Overall, balancing test failures were more due to under-scheduling than over-scheduling.

Table 11: Frequency of Balancing Test Failures due to Over-Scheduling and Under-Scheduling

BAA	October 2022		November 2022		December 2022	
	Over-scheduling	Under-Scheduling	Over-scheduling	Under-Scheduling	Over-scheduling	Under-Scheduling
AVA	--	100.00%	55.56%	44.44%	100.00%	--
AZPS	14.29%	85.71%	37.50%	62.50%	45.45%	54.55%
BANC	--	100.00%	--	100.00%	--	--
BCHA	--	--	--	--	--	--
BPA	30.71%	69.29%	55.56%	44.44%	5.26%	94.74%
IPCO	--	100.00%	--	100.00%	100.00%	--
LADWP	100.00%	--	--	100.00%	33.33%	66.67%
NEVP	75.00%	25.00%	64.29%	35.71%	75.00%	25.00%
NWMT	33.33%	66.67%	33.33%	66.67%	12.50%	87.50%
PACE	45.45%	54.55%	66.67%	33.33%	50.00%	50.00%
PACW	45.45%	54.55%	60.00%	40.00%	50.00%	50.00%
PGE	66.67%	33.33%	50.00%	50.00%	50.00%	50.00%
PNM	45.83%	54.17%	64.52%	35.48%	45.00%	55.00%
PSEI	33.33%	66.67%	38.89%	61.11%	--	100.00%
SCL	--	--	--	100.00%	--	--
SRP	31.25%	68.75%	61.54%	38.46%	55.56%	44.44%
TEP	53.85%	46.15%	38.46%	61.54%	33.33%	66.67%

BAA	October 2022		November 2022		December 2022	
	Over-scheduling	Under-Scheduling	Over-scheduling	Under-Scheduling	Over-scheduling	Under-Scheduling
TIDC	--	100.00%	66.67%	33.33%	66.67%	33.33%
TPWR	100.00%	--	100.00%	--	33.33%	66.67%

C. Flexible Ramp Sufficiency Test Failures

The table below shows the frequency that each WEIM entity passed the flexible ramping sufficiency test in the upward and downward directions, for each month within the quarter. Generally, the entities passed the flexible ramp sufficiency test very frequently throughout the months in the quarter.

Table 12: Frequency of Passing Flexible Ramping Sufficiency Test

BAA	October 2022		November 2022		December 2022	
	Upward Direction	Downward Direction	Upward Direction	Downward Direction	Upward Direction	Downward Direction
AVA	99.93%	99.83%	100.00%	100.00%	99.93%	99.97%
AZPS	100.00%	99.76%	99.93%	99.83%	99.56%	99.93%
BANC	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
BCHA	100.00%	99.90%	100.00%	100.00%	100.00%	100.00%
BPA	99.83%	100.00%	99.93%	99.79%	99.63%	99.80%
IPCO	100.00%	100.00%	99.90%	100.00%	100.00%	100.00%
LADWP	99.93%	100.00%	100.00%	100.00%	100.00%	100.00%
NEVP	99.87%	99.53%	99.76%	99.38%	99.97%	99.87%
NWMT	100.00%	100.00%	99.55%	99.97%	99.16%	99.93%
PACE	99.90%	100.00%	100.00%	100.00%	99.97%	100.00%
PACW	100.00%	99.93%	99.86%	100.00%	100.00%	99.97%
PGE	99.80%	100.00%	98.99%	100.00%	99.90%	100.00%
PNM	99.76%	99.80%	99.86%	99.86%	99.19%	100.00%
PSEI	100.00%	99.87%	99.97%	100.00%	100.00%	100.00%
SCL	100.00%	100.00%	99.90%	99.79%	99.97%	99.40%
SRP	99.36%	99.76%	99.55%	99.13%	99.19%	99.66%
TEP	100.00%	100.00%	100.00%	99.97%	99.80%	100.00%
TIDC	100.00%	100.00%	100.00%	99.86%	98.82%	100.00%
TPWR	100.00%	100.00%	99.83%	100.00%	100.00%	99.93%

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 20th day of November 2022.

Is/ Anna Pascuzzo

Anna Pascuzzo