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The Stakeholder Initiative Catalog process was ostensibly developed to allow market participants to have meaningful input with regards to the initiatives on which the CAISO and market participants would work. In practice, this process has never meaningfully affected the CAISO’s working priorities, even when market participants ranked priorities. To that end, the CAISO’s decision to not provide a ranking opportunity in 2015 relieves market participants of an obligation that has had no bearing on anything.

NRG understands the CAISO’s rationale for not ranking stakeholder initiatives in 2015. However, NRG would like to see the CAISO implement a process which would provide market participants with a meaningful opportunity to influence the CAISO’s work priorities. To the extent the CAISO views itself as a customer-focused organization, it is bewildering that the CAISO does not incorporate input from its market participants into its work prioritization. The CAISO’s market participants are a diverse group, with divergent interests, and developing actionable priorities from conflicting input will not be easy. That does not mean that market participants should have no voice in setting the CAISO’s – and, just as importantly, market participants’ – collective priorities.

NRG offers one additional initiative for the catalog:

Inter-Scheduling Coordinator Trade Adjustment Symmetry. Market participants engage in an Inter-Scheduling Coordinator Trade based on a forecast for a Variable Energy Resource. Then the CAISO updates the VER forecast, if the forecast is lower than the amount in the IST, the IST is reduced and the SC for the VER is “forced” into a Converted Physical Trade (CPT) for the difference between the previous IST and the new IST. However, if the later CAISO VER forecast is higher than the amount in the IST, the IST is not adjusted. This creates asymmetrical treatment in two ways: (1) by forcing the VER SC into a CPT only where the forecast is lower but never forcing the SC for the VER buyer into a CPT where the forecast is higher, and (2) creating a mechanism in which the amount of the IST can only be reduced, but never increased, by a more accurate forecast. If the CAISO VER forecast is unbiased, the IST should be allowed to go up – creating a CPT for the SC buyer – when the T-45 forecast is higher than the IST.