

Powerex Corp.

Phase 1 – Transmission Constraints Comments on Straw Proposal

Submitted By	Company or Entity	Date Submitted
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Phase 1 Stakeholder comments should be submitted to: Phase1TC@caiso.com

Powerex appreciates this opportunity to provide comments on the Straw Proposal.

Constraints and Contingency List

Powerex believes that the CAISO's proposal to make the network model available to market participants including a description of changes to the network model is appropriate. However, Powerex urges the CAISO to be more specific on the timing of the release of network models to market participants and to further coordinate its processes to eliminate/reduce the time when the various CAISO market models/software are using different versions of the network model.

Powerex further believes that the proposal to provide on a daily basis after the market is complete to identify enforced individual transmission elements, corridors, nomograms, and active contingencies does not go far enough to provide transparency to the market. Powerex strongly believes that the CAISO should make this information available at least one hour prior to the close of the market. Powerex also believes that on a daily basis after the market is complete the CAISO should identify any late changes that impact the enforced constraints or active contingencies and also clearly identify the binding constraint and cause for any congestion on the system. Powerex's preference would be for this information to be posted on OASIS.

Constraint Management – Adjustments

Powerex believes that any time the CAISO makes adjustments to or biases constraints that the adjustments are posted immediately but no later than one hour on OASIS.

Powerex also believes that it would never be appropriate to make any adjustments to scheduling limits on the interties without first posting to OASIS.

Draft Tariff Language

Powerex believes the language in section 27.5.6 provides the CAISO with too much discretion on the interties. Powerex does not believe the CAISO should at any time have the option to relax the scheduling limits on interties. Any “relaxation” of scheduling limits without consulting with adjacent BAAs would potentially lead to seams issues and/or infeasible schedules.