Stakeholder Comments

Bid Cost Recovery and Variable Energy Resource Settlements Draft Tariff Language

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The following are Southern California Edison's (SCE) comments on the California Independent System Operator's (CAISO) February 29, 2016 Draft Tariff Language[1].

The CAISO has inadequately defined and identified Residual Imbalance Energy (RIE)

The CAISO's proposal renders obsolete, the meaning of RIE. Effectively, it has created three new types of RIE: (1) RIE due to residual economic dispatch from prior periods for non-VER resources, (2) RIE due to residual economic dispatch from prior periods for VER resources, and (3) RIE due to forecast change for VER resources.

SCE strongly recommends the CAISO:

1. clearly define and identify the new types of RIE as proposed in the Draft Final Proposal[2] and distinguish them from the existing RIE.
2. apply such identification throughout the tariff and clearly differentiate the settlement treatment for different types of RIE.
3. clearly define the classification of energy for self-scheduled VER where the self-scheduled VER quantity does not equal to CAISO's forecasted VER quantity and there is no economic dispatch.
4. provide transparency of relevant Dispatch Interval(s) and Bid(s) that led to the formation of the RIE in the referenced interval.

There are numerous references to RIE in the existing tariff. The proposed tariff language posted by the CAISO does not address most of them. SCE has compiled a non-exhaustive list of these and lists them at the end of these comments.

[1] http://www.caiso.com/Documents/DraftTariffLanguage-BidCostRecoveryandVariableEnergyResourcesSettlements.docx

[2] http://www.caiso.com/Documents/DraftFinalProposal_BidCostRecovery_VariableEnergyResourceSettlements.pdf

Non-exhaustive list of references to Residual Imbalance Energy (RIE) in the tariff that were not included in proposed draft tariff language

11.5.1.2 RTD Instructed Imbalance Energy Settlements

For each Settlement Interval, RTD IIE consists of the following types of Energy: (1) RTD Optimal Energy; (2) Residual Imbalance Energy; (3) RTD Minimum Load Energy; (4) RTD Exceptional Dispatch Energy; (5) Regulation Energy; (6) Standard Ramping Energy; (7) Ramping Energy Deviation; (8) RTD Derate Energy; (9) MSS Load Following Energy; (10) RTD Pumping Energy; and (11) Operational Adjustments. Payments and charges for RTD IIE attributable to each resource in each Settlement Interval shall be settled by debiting or crediting, as appropriate, the specific Scheduling Coordinator's RTD IIE Settlement Amount. The RTD IIE Settlement Amounts for the Standard Ramping Energy shall be zero. The RTD IIE Settlement Amounts for RTD Optimal Energy, RTD Minimum Load Energy, Regulation Energy, Ramping

11.8.4 RTM Bid Cost Recovery Amount

For purposes of determining the RTM Unrecovered Bid Cost Uplift Payments as determined in Section 11.8.5, and for the purposes of allocation of Net RTM Bid Cost Uplift as described in Section 11.8.6.6 the CAISO shall calculate the RTM Bid Cost Shortfall or the RTM Bid Cost Surplus as the algebraic difference between the RTM Bid Cost and the RTM Market Revenues for each Settlement Interval. The RTM Bid Costs shall be calculated pursuant to Section 11.8.4.1. The RTM Market Revenues shall be calculated pursuant to Section 11.8.4.2. The Energy subject to RTM Bid Cost Recovery is the Instructed Imbalance Energy described in Section 11.5.1, excluding Standard Ramping Energy, Residual Imbalance Energy, Exceptional Dispatch Energy, Derate Energy, Ramping Energy Deviation, Regulation Energy and MSS Load Following Energy regardless of whether the Energy is from the FMM or RTD, and is subject to the application of the Real-Time Performance Metric as described in Section 11.8.4.4 and the Persistent Deviation Metric described in Section 11.17.

11.8.4.1.5 RTM Energy Bid Cost

For any Settlement Interval, the RTM Energy Bid Cost for the Bid Cost Recovery Eligible Resource except Participating Loads shall be computed as the sum of the products of each Instructed Imbalance Energy (IIE) portion, except Standard Ramping Energy, Residual Imbalance Energy, Exceptional Dispatch Energy, Derate Energy, MSS Load Following Energy, Ramping Energy Deviation and Regulating Energy, with the relevant Energy Bid prices, the Default Energy Bid price, or the Locational

11.8.4.2 RTM Market Revenue Calculations

The RTM Market Revenue calculations are subject to the Real-Time Performance Metric and the Persistent Deviation Metric as described in Sections 11.8.4.4 and 11.17, respectively.

11.8.4.2.1 For each Settlement Interval in a CAISO Real-Time Market Commitment Period, the RTM Market Revenue for a Bid Cost Recovery Eligible Resource is the algebraic sum of the elements listed below in this Section. For Multi-Stage Generating Resources the RTM Market Revenue calculations will be made at the Generating Unit level.

(a) The sum of the products of the FMM or RTD Instructed Imbalance Energy (including Energy from Minimum Load of the Bid Cost Recovery Eligible Resource committed in RUC and where for Pumped-Storage Hydro Units and Participating Load operating in the pumping mode or serving Load, the MWh is negative), except Standard Ramping Energy, Residual Imbalance Energy, Exceptional Dispatch Energy, Derate Energy, MSS Load following Energy, Ramping Energy Deviation and Regulation Energy, with the relevant

11.8.4.2.2 For each Settlement Interval in a non-CAISO Real-Time Market Commitment Period, the Real-Time Market Revenue for a Bid Cost Recovery Eligible Resource is subject to the Real-Time Performance Metric and is the algebraic sum of the following:

(a) The sum of the products of the FMM or RTD Instructed Imbalance Energy (excluding the Energy from Minimum Load of Bid Cost Recovery Eligible Resources committed in RUC), except, Standard Ramping Energy, Residual Imbalance Energy, Exceptional Dispatch Energy, Derate Energy, MSS Load Following Energy, Ramping Energy Deviation and Regulating Energy, with the relevant FMM or RTD Market LMP, for each Dispatch Interval in the Settlement Interval;

11.17 Application of the Persistent Deviation Metric

The CAISO will modify the Bid Cost Recovery calculations described in Section 11.8 and Residual Imbalance Energy payments in Section 11.5.5 as described below to address persistent deviations that expand Bid Cost Recovery payments beyond what is necessary for purposes of ensuring Bid Cost Recovery.

11.17.1.2 Persistent Deviation Adjustments

The ISO will apply the following rules to evaluate the resource's performance relative to the Persistent Deviation Metric Threshold and will apply the Persistent Deviation Metric as specified below.

11.17.1.2.1 Rule 1

If six (6) or fewer Settlement Intervals out of the previous twenty-four (24) Settlement Intervals are flagged pursuant to the rules in Section 11.17.1.1, then: (a) the RTM Energy Bid Costs will be based on the applicable Energy Bid price as specified in Section 11.8.4.1.5, and (b) Residual Imbalance Energy will be settled based on the reference hour Energy Bid as specified in Section 11.5.5.

11.17.1.2.2 Rule 2

If seven (7) or more Settlement Intervals of the previous twenty-four (24) Settlement Intervals are flagged as exceeding the Persistent Deviation Metric Threshold, then for all the previous twenty-four(24) Settlement Intervals in the two-hour window: (a) the RTM Energy Bid Costs specified in Section 11.8.4.1.5 (i) for Optimal Energy above the Day-Ahead Scheduled Energy will be based on the lesser of the applicable Default Energy Bid price, the applicable Energy Bid price, as mitigated, or the applicable FMM or RTD Locational Marginal Price, and (ii) for Optimal Energy below the Day-Ahead Scheduled Energy the greater of the applicable Default Energy Bid price, the applicable Energy Bid price, as mitigated, or the applicable FMM or RTD Locational Marginal Price; and (b) Residual Imbalance Energy as specified in Section 11.5.5 (i) for Residual Imbalance Energy above the Day-Ahead Scheduled Energy will be based on the lesser of the applicable Default Energy Bid price, the relevant Energy Bid Price, as mitigated, or the applicable RTD Locational Marginal Price, and (ii) Residual Imbalance Energy below the Day-Ahead Scheduled Energy will be based on the greater of the applicable Default Energy Bid price, the relevant Energy Bid Price, or the applicable RTD Locational Marginal Price.

34.17.4 Inter-Hour Dispatch Of Resources With Real-Time Energy Bids

Dispatch Instructions associated with the ramp between the Real-Time Market Bid in one hour and the Real-Time Market Bid in the immediately succeeding Trading Hour shall be determined optimally by the SCED if the CAISO has Bids for either or both relevant Operating Hours. For any Operating Hour(s) for which Bids have been submitted Dispatch Instructions will be optimized such that the Dispatch Operating Point is within the Bid range(s). For any Operating Hour without submitted Bids, Dispatch Instructions will be optimized such that the Dispatch Operating Point conforms to the Schedule within the Operating Hour. Energy resulting from the Standard Ramp shall be deemed Standard Ramping Energy and will be settled in accordance with Section 11.5.1. Energy resulting from any ramp extending beyond the Standard Ramp will be deemed Ramping Energy Deviation and will be settled in accordance with Section 11.5.1. Energy delivered or consumed as a result of CAISO Dispatch of a resource's Energy Bid in one Operating Hour to a Dispatch Operating Point such that the resource cannot return to its successive Operating Hour Schedule or to an infra-marginal operating point by the beginning of the next Operating Hour is Residual Imbalance Energy and shall be settled as Instructed Imbalance Energy as provided for in Section 11.5.1 and also may be eligible for recovery of its applicable Energy Bid Costs in accordance with Section 11.8. Similarly, Energy delivered or consumed as a result of CAISO Dispatch of a resource's Energy Bid in a future Operating Hour to a Dispatch Operating Point different from its current Operating Point prior to the end of the current Operating Hour is also considered Residual Imbalance Energy and shall be settled as Instructed Imbalance Energy as provided for in Section 11.5.1 and also may be eligible for recovery of its applicable Energy Bid Costs in accordance with Section 11.8. When Ramping Energy Deviation and Residual Imbalance Energy coexist within a given Dispatch Interval, the Ramping Energy Deviation shall be the portion of Instructed Imbalance Energy that is produced or consumed within the Schedule-change band defined by the accepted RTM Bids of the two consecutive Settlement Periods; the Residual Imbalance Energy shall be the portion of Instructed Imbalance Energy that is produced or consumed outside the Schedule-change band.

- Residual Imbalance Energy

Extra-marginal IIE produced or consumed at the start or end of a Trading Hour outside the hourly schedule-change band and not attributed to Exceptional Dispatch. Residual Imbalance Energy is due to a Dispatch Instruction in the previous Trading Hour or a Dispatch Instruction in the next Trading Hour. Residual Imbalance Energy may overlap only with Day-Ahead Scheduled Energy. Residual Imbalance Energy does not apply to Non-Dynamic System Resources (including Resource-Specific System Resources). Residual Imbalance Energy is settled as bid, based on the Real-Time Energy Bid of the reference hour, as described in Section 11.5.5 and it is not included in BCR as described in Section 11.8.4.

Part A – Monthly Calculation of Grid Management Charge (GMC)

The GMC consists of the following separate service charges: (1) the Market Services Charge; (2) the System Operations Charge; and (3) the CRR Services Charge. The GMC revenue requirement, determined in accordance with Part C of this Schedule 1, shall be allocated to the service charges specified in Part A of this Schedule 1 as follows: twenty seven (27) percent to Market Services; seventy (70) percent to System Operations; and three (3) percent to CRR Services. Starting in 2017 and every three (3) years thereafter, the CAISO will conduct an updated cost of service study, in consultation with stakeholders and using costs from the previous year. In conducting each cost of service study, the CAISO will recalculate the three service charge percentages and the rates for the fees and charges that constitute the Grid Management Charge as set forth in Section 11.22, as well as the EIM Administrative Charge. If, based on the cost of service study results, the service category revenue requirement allocation percentages or the level of fees and charges have changed, the CAISO will submit tariff amendments to reflect such changes pursuant to Section 205 of the FPA. 1. The rate for the Market Services Charge will be calculated by dividing the annual GMC revenue requirement allocated to this service category by the forecast annual gross absolute value of MW per hour of Ancillary Services capacity awarded in the Day-Ahead and Real-Time Markets, MWh of Energy cleared in the Day-Ahead market, Virtual Demand Award, Virtual Supply Award, and Instructed Imbalance Energy, less the forecast annual gross absolute value of such Energy as may be excluded for a load following MSS pursuant to an MSS agreement, Standard Ramping Energy, Regulation Energy, Ramping Energy Deviation, Residual Imbalance Energy, Exceptional Dispatch Energy and Operational Adjustments for the Day-Ahead and Real-Time.

- RTD Derate Energy

Extra-marginal RTD IIE, exclusive of FMM IIE, Standard Ramping Energy, Ramping Energy Deviation, Residual Imbalance Energy, MSS Load Following Energy, and RTD Minimum Load Energy produced or consumed due to Minimum Load overrates or PMax derates. RTD Derate Energy is produced above the higher of the FMM Schedule or the registered Minimum Load, and below the lower of the overrated Minimum Load and the Dispatch Operating Point, or consumed below the lower of the FMM Schedule, and above the higher of the derated PMax or the Dispatch Operating Point. There could be two RTD Derate Energy slices, one for the Minimum Load overrate, and one for the PMax derate. RTD Derate Energy does not overlap with FMM IIE, Standard Ramping Energy, Ramping Energy Deviation, Residual Imbalance Energy, RTD Minimum Load Energy, RTD Exceptional Dispatch Energy, or RTD Optimal