

Southwestern Power Group Comments on Market Design Initiatives Catalog

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Southwestern Power Group (SWPG) appreciates the opportunity to submit comments as part of the CAISO's Market Design Catalog Initiative stakeholder process. The Southwestern Power Group is an Independent developer of utility-scale generation and transmission in the Desert Southwest.

SWPG is developing a Double-circuit 500 kV interstate transmission project between central New Mexico and Metro-Phoenix. The purpose of the project is to deliver primarily renewable energy from NM and AZ to western markets (at the Palo Verde hub).

SWPG submitted more general comments on November 25, 2013. SWPG offers the list of our top four initiatives below. These are in addition to our most preferred initiative, which is the ISO's development of a multi-year RA import allocation mechanism as part of the Joint Reliability Framework, a non-discretionary initiative.

- 7.4 Long Term CRR Auction
- 7.2 Flexible Term Lengths of Long Term CRRs
- 7.5 Multi-period Optimization Algorithm for Long Term CRRs
- 10.1 EIM Transmission Access Charge

SWPG appreciates the ISO consideration of our interests in these four initiatives.