

Western Power Trading Forum Comments on 2019 Draft Initiative Catalog
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The Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

Comments

WPTF appreciates the opportunity to submit comments on the CAISO's initiative catalog.

Section 4 Initiatives Completed Since Previous Catalog

The CAISO notes in the beginning of this section that, "(f)or the purpose of this catalog, policy development is considered completed when the stakeholder process is finished and the CAISO Board of Governors approved policy's proposal." WPTF does not believe that 4.8 EIM Offer Rules – EIM Resource Sufficiency Evaluation or 4.11 Day-Ahead Market Enhancements – 15-minute Granularity should be included in this section. The former has not even made it to the initiative phases and has only consisted of two workshops, and the latter is extremely unlikely to make it to the EIM board by October which would necessitate the stakeholder process concluding in late September – only a month away. The CAISO has not produced a standalone 15-minute proposal for stakeholder consideration or demonstrated that load-serving entities have the capability to produce a rational 15-minute forecast in the day-ahead timeframe; both of which WPTF believes are prerequisite for moving forward to the Board.

4.8 EIM Offer Rules – EIM Resource Sufficiency Evaluation (page 11)

WPTF supports the CAISO moving forward with this in 2019 as a separate initiative. The CAISO has previously committed to addressing some of the resource sufficiency issues within the BPM process and within the Day-Ahead Market Enhancements initiative. The latter is specifically noted in the catalog¹; however, since this commitment was made, the Day-Ahead Market Enhancements initiative has been delayed and had phase one significantly descoped and does not seem to include enhancements to the resource sufficiency test. Therefore, WPTF supports resource sufficiency test enhancements within one initiative that includes consideration of; (1) Correct overstatement of the flexible ramp sufficiency requirement; (2) address under-valuing EIM Entity resources; (3) correct improper consequences for failing the flexible ramp sufficiency test; (4) performing flexible ramp sufficiency at T-40 with 5 minute granularity; (5) potentially make uncertainty histogram enhancements; and (6) enabling participating resource scheduling coordinators visibility into the test obligations.

¹ "...the CAISO is discussing through the Day-Ahead Market Enhancements initiative policy changes to the real-time sufficiency evaluation: moving to 15- minute base schedule submission, freezing transfer by 15-minute interval, and modify the repercussion for failing the balancing test to 15-minute interval."

The importance of this initiative has been articulated numerous times in the EIM Offer Rules [Workshop](#) and workshop [comments](#). Making incremental improvements to the resource sufficiency test in different forums is challenging because it makes it difficult to understand the cumulative impacts of each change to the test. The piecemeal approach makes it impossible for stakeholders to do complete analysis of all the moving parts and assess whether the changes make sense all together.

WPTF thanks the CAISO for consideration of our comments.