

Western Power Trading Forum on 2020 and 2024 Draft Local Capacity Requirements Study Results

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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.

Summary

WPTF appreciates the opportunity to submit these brief comments on the CAISO's 2020 and 2024 Draft Local Capacity Requirements Study Results discussed with stakeholders at the March 14, 2019 meeting. WPTF appreciates the efforts put in by the CAISO staff each year as they plan for and conduct these studies. WPTF strongly supports market transparency which includes providing information to market participants that can be used to inform both near-term and long-term business decisions, such as the deficiency amounts for each local area and sub-area. WPTF was surprised to hear the CAISO proposing to no longer publish the deficiency numbers for each local area and sub-area. The study results are extremely useful information used by market participants as one indicator of where additional capacity and transmission may be valuable to the overall reliability of the grid. While WPTF understands the deficiency amounts that have historically been calculated by the CAISO and included in the results are based on sophisticated models with inherent, albeit vetted, assumptions, they remain a useful piece of information that are used by the market. WPTF encourages the CAISO to continue publishing the deficiency numbers, and at a minimum, engage with stakeholders on this topic such that a robust discussion around how these numbers are used by market participants can take place before moving forward with the proposal. This would also provide an opportunity for stakeholders to better understand why the CAISO is proposing to no longer publish this valuable information.

WPTF thanks the CAISO for consideration of our comments.