

Western Power Trading Forum Comments on CRR Enhancements

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WPTF appreciates the opportunity to submit these brief comments. WPTF recognizes that it is beyond the deadline of comments requested by the CAISO. Primarily WPTF wishes to endorse certain comments submitted by other stakeholders.

Importance of non-discriminatory treatment in for load migration fractional MW CRRs.

WPTF supports comments by AReM that elimination of CRRs smaller than 0.1MW would institute a bias in value, discriminating against ESPs. WPTF encourages the CAISO to not make these changes.

Revenue Adequacy Improvements

WPTF supports possible improvements to revenue adequacy through the following mechanisms through the CAISO's using the "break-even OTC" value in the annual process. WPTF also supports further clarification along the lines requested by Powerex. WPTF encourages implementation of improved modeling of transmission outages and derates and supports improved outage reporting generally.

LT Auction

WPTF supports the development of a long-term auction for CRRs and encourages the CAISO to initiate stakeholder discussions on the design of this auction. WPTF also supports further consideration of balancing auctions such as those proposed by DC Energy.