

WPTF is interested in further information about the CAISO's need to relax transmission constraints in real time. In fact, WPTF filed at FERC when the CAISO this language under compliance, WPTF requested a stakeholder process. While the CAISO has offered a call to discuss the tariff language after its publishing of the language, this does not seem to provide an opportunity to understand and comment upon the broad issues, especially given that it is occurring after the tariff language has been drafted.

WPTF understands that the tariff language modifications are intended to correct the language for the fact that the FNM does not – in itself – contain all the information about the enforcement of constraints and the limits of transmission constraints. WPTF does not conceptually object to conforming the tariff language to reflect actual operating practice.

However, the tariff modifications bring to light the fact that absent capturing all of this information in files that are controlled and distributed through the FNM process, there is no other process that makes details about the constraints that are enforced and the limits – including biasing – that the CAISO applies. WPTF is very concerned about the lack of transparency. WPTF would like to see the limits the CAISO ultimately applies in biasing the transmission constraints. WPTF would like to see the CAISO report data associated with transmission limits and whether transmission limits are enforced or not if that information is not captured in the network model.

WPTF hopes that transparency is enhanced through this process rather than diminished. We continue to encourage the CAISO to have a substantive meeting about the management of transmission constraints and the management of the data and transparency associated with the CAISO's management of these constraints.

Please let me know if you have questions about WPTF's position.

Thanks,  
Ellen

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