Decision on Proposal to Address Potential Load Underscheduling Until Implementation of Convergence Bidding



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Interim Scheduling Requirement Proposal Presented at July Board Meeting

Proposal Represents a Balance Among Stakeholder Interests

- LSEs with more than 15% of Demand Served in Real-Time Market Assessed Scheduling Charge
 - \$150/MWh for Real-Time Demand between 15 and 20%
 - \$250/MWh for Real-Time Demand > 20%
- Several Exemptions Proposed to Ensure Charge Implemented Fairly
 - Load Forecast Error
 - Real-Time price < Day-Ahead price</p>
 - Small LSEs Exempted
- Identified Need to Develop Bright Line Trigger for Assessing the Charge



Continued Stakeholder Process on Outstanding Issues

- Stakeholder Process to Address Unresolved Policy Issues
 - 1. Bright Line Trigger
 - 2. Level of Small Load Exemption
- August 2 White Paper Proposal on Outstanding Issues
- August 10 Joint MSC/Stakeholder Meeting
- September 6 Board Decision



CAISO Recommendation for Bright Line Trigger

Two options presented in August 2 white paper

- 5 Percent Monthly Exemption; or
- 5 Percent Annual Exemption
- CAISO Recommendation: 5% Monthly Exemption
 - Annual Exemption could allow for gaming
 - Monthly Exemption
 - allows for SCs to correct behavior,
 - smaller potential for overscheduling to avoid charge



CAISO Recommendation for Small Load Exemption

- LSEs with hourly loads less than 500 MW in a LAP exempt from interim scheduling charge
- Why include an exemption for small LSEs?
 - Small LSEs have limited ability to impact DAM price
 - Certain Small LSEs have unpredictable loads
- Why 500 MWs?
 - More than 1000 MW load necessary to significantly move DAM price
 - 500 MW exemption conservative level that captures all LSEs with potential to influence DAM price
 - Proposed 15% Threshold results in Large LSEs having greater ability to impact Day-Ahead Market price than 100% of combined Small LSE load



Sright Line Trigger SCE: Annual Option provides too much leeway, prefer Monthly Option PG&E: Prefers Annual Option SDG&E: No Comments Provided Small LSEs: Slight preference for Annual Option

Small Load Exemption

- SCE finds it discriminatory, argue that collusion possible
- PG&E finds it discriminatory
- SDG&E: No Comments Provided
- Small LSEs support exemption

