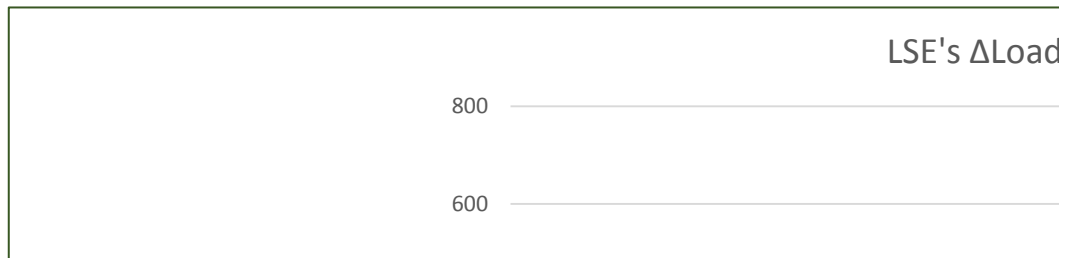
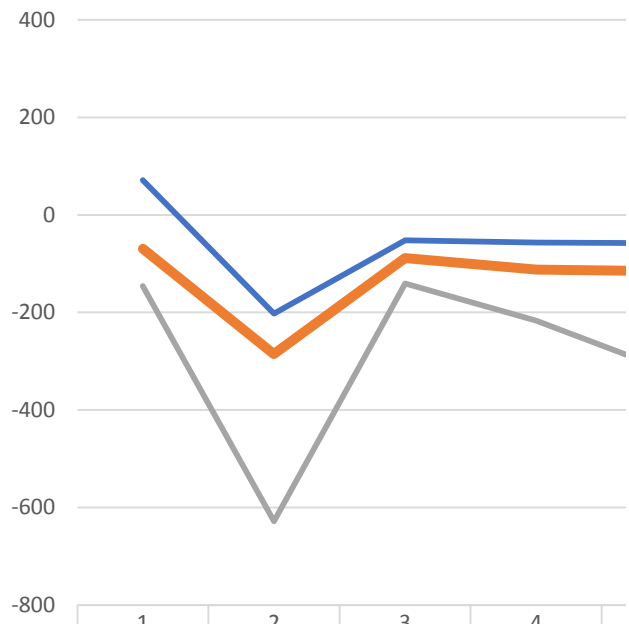


Example

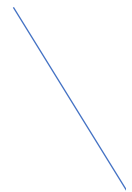
	Average of sc_start_load	Average of sc_end_load	Average of sc_load_ramp	Average of system_start_load	Average of system_end_load	Average of system_load_ramp	Average of delta_load_2020
Jan	800	720	-80	20211.64	23828.06	3616.426	7603.609
Feb	590	300	-290	20076.05	23271.88	3195.831	7036.877
March	420	330	-90	19211.19	22479.39	3268.202	5202.241
April	480	370	-110	19626.18	22386.24	2760.066	5345.396
May	480	390	-90	22193.07	23938.49	1745.417	4807.356
June	420	390	-30	23351.82	24519.75	1167.928	3827.755
July	570	460	-110	31270.83	30926.28	-344.545	1802.532
august	720	630	-90	30681.47	31169.92	488.4519	3453.526
Sept	750	640	-110	26674.01	27983.39	1309.377	4188.791
Oct	580	420	-160	22066.19	24628.8	2562.608	5792.533
Nov	680	425	-255	20562.8	24356.24	3793.445	6795.328
Dec	630	490	-140	18575.47	24284.95	5709.476	7483.19





	1	2	3	4
ISO.s 2020 proposed allocation method	71.47142329	-202.0729666	52.35936424	-56.88849969
CDWR proposed Option1	-69.46179614	-285.2121355	-88.29585864	-111.9301665
CDWR analyzed Option 2	-146.0448296	-628.0065798	-140.5471229	-216.7741376

CDWR proposes option 1 method for equitable allocation based on LSE's ramping behavior

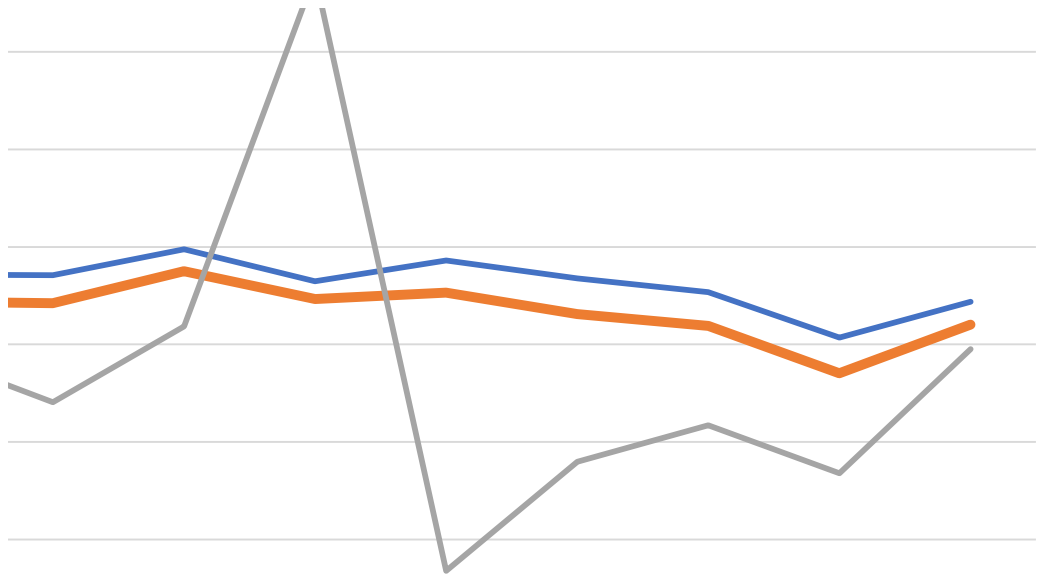


LSE's $\Delta L$ allocations	
	57.61
	-211.14
	-55.21
	-57.69
	-32.25
	15.01
	-74.44
	-25.28
	-36.77
	-90.83
	-181.15
	-93.65

Allocation	

^

allocation  
formula for  
January



5	6	7	8	9	10	11	12
8.15551349	4.713493845	70.68050875	27.84103112	64.85430258	92.97472826	185.9451462	112.5903873
15.6731819	49.62860265	106.5715214	-93.9113636	-137.7179227	161.7548998	259.1752733	-159.6833946
18.5956814	162.65232945	57.5419376	-663.9862354	440.5694092	365.6316292	464.2695732	-209.2908505

Drawback of method

CDWR appreciates ma  
 come to a conclusion  
 system reliability can  
 average, it was allocat  
 the system start and e  
 method still can alloc

As a solution, CDWR f  
 shown in the attached  
 ramp; and discovered  
 solution.

Therefore, CDWR beli  
 ISO proposed formula  
 CDWR proposed optic  
 Option 2: is not a viab

ISO.s 2020 proposed allocation method	proposed Option1	analyzed Option 2
57.61486765	-80	-168.2016161
-211.1373677	-290	-638.5489446
-55.20725281	-90	-143.2597321
-57.69333184	-110	-213.0360016
-32.25456055	-90	-247.8846942
15.00501393	-30	-98.32172623
-74.44384933	-110	575.4784423
-25.2827736	-90	-636.3315247
-36.77323564	-110	-351.8978071
-90.82931327	-160	-361.6648445
-181.1542348	-255	-456.7902626
-93.65050286	-140	-183.4925864
$D19 + ((B19 + C19) / (E19 + F19)) * (H19 - G19)$	$IF(D19 + ((B19 + C19) / (E19 + F19)) * (H19 - G19) > D19, D19, D19 + ((B19 + C19) / (E19 + F19)) * (H19 - G19))$	$D19 + ((-B19 + C19) / (-E19 + F19)) * (H19 - G19)$

<p>scaling of SC's 2020 allocation based on the factor derived by sum of SC's start and end load divided by system start and end load does not seem logical when the theme is about ramps.</p>	<p>None; rather it fixes CAISO method of scaling based on Sc's sum of load and system load; it gives weight to LSE's 2018 performance and if the scaled values is greater than 2018 , then SC should not be allocated more than what it did in 2018; emphasizes SC's current behavior</p>	<p>using a factor based on SC's load ramp divided by system load ramp for scaling, it gives anomalous results such as for July; it shows that scaling of future ramps based on whatever ratio may yield unintended anomalous results.</p>
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making changes to the flexible capacity allocation formula for 2020. Based on the CAISO modified formula that the modified formula for allocation still does not address the CDWR's concern that carefully planned still be penalized; for example, for the month of January CDWR observed that even though CDWR maintained positive  $\Delta L$  allocation. This problem persists due to the scaling factor which is calculated as sum of LSE and load for the month. For entities like CDWR where there is no load growth and no consistent ramping rate obligation.

was analyzed two options to further modify. Option1 (as proposed here by CDWR) would address the scaling spreadsheet. CDWR also thought of second option in which scaling factor would be the ratio of LSE's average load that may yield to erroneous results, such as for July, as shown, LSE may receive high positive allocation.

leaves, CDWR proposed (option 1) modification of formula will provide equitable allocations.

in the spreadsheet:  $\Delta L$  allocation to SC=  $D19 + ((B19+C19)/(E19+F19)) * (H19-G19)$

option 1:  $\Delta L$  allocation to SC=  $IF(D19 + ((B19+C19)/(E19+F19)) * (H19-G19) > D19, D19, D19 + ((B19+C19)/(E19+F19)) * (H19-G19)$   
the option.

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and data provided, CDWR has  
d negative load ramps to help  
ained negative load ramps in  
;E's start and end load divided by  
; load increase, the modified

ling concern; the revised formula is  
verage ramp to the system average  
Hence, the second option is not a

))\*(H19-G19))