

Changes to Bidding and Mitigation of Commitment Costs



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Market Surveillance Committee Meeting March 19, 2010

Background

At the start of the new market in April 2009

- Excessive cycling of units
- Commitment to Pmin and then shutdown
- Changes considered to SU and ML
 - Daily bidding?
 - More frequent election to proxy/registered?
 - Account for opportunity costs?
- Since then...
 - Improvements to software and processes
 - Fewer generation and transmission outages
 - SU/ML changes set aside



Overview

Changes to Start-Up and Minimum Load

- Independent election to proxy or registered
- Daily bidding of proxy SU and/or ML IF bid price below proxy
- Changes to the proxy cost option
 - Registered O&M option
 - Gas delivery points granularity
 - Opportunity costs for use-limited resources
- Rules for MSG Transition Costs
 - Two rules that bound costs within the MSG transition matrix



Election of Proxy or Registered SU and ML costs

- Independent election of SU and ML costs
 - A registered cost can be submitted for start-up which can account for non-fuel costs such as maintenance
 - Proxy cost can be elected for minimum load costs as these costs are highly dependent on fuel costs



Daily bids for SU/ML

- Resources that have elected the proxy cost option for SU and/or ML
- Can bid in on a daily basis
- As long as those bid values are below the proxy cost value



Modification of the Proxy Cost option

- Bidding of O&M costs (SU)
 - Annual basis
- Refinement to Gas Prices (SU and ML)
 - Two additional delivery points
- Opportunity Costs for use-limited resources (SU)
 - Based on forecasted prices and use-limitation plan



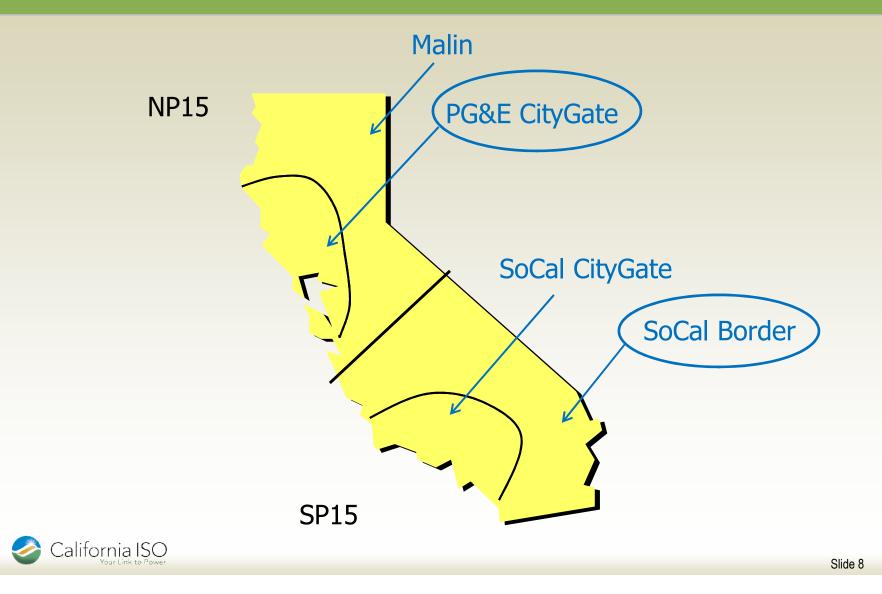
Bidding O&M Costs

Current ISO defaults would be the proxy option

- Gas Turbine \$4/MWh
- Combined Cycle \$2/MWh
- Negotiated \$6/MWh
- PJM Approach would be the registered option
 - FERC Accounts prescribe costs
 - Annual election/update
- PJM Results
 - Gas Turbine: \$6.47 in 2008, and \$7.09 in 2009
 - Combined Cycle: \$2.80 in 2008, and \$3.07 in 2009



Refinement to Gas Prices



Comparison of gas delivery point prices

- On average, the price at Malin is 31¢ per MMBtu (5%) less than the price at PG&E CityGate
- The correlation coefficient between PG&E CityGate and Malin is 0.87
- On average, the price at SoCal Border is 1¢ per MMBtu (0.01%) less than the price at SoCal CityGate
- The correlation coefficient between SoCal Border and SoCal CityGate is 0.99



Gas transport costs

- Gas transport costs
 - Highly locational essentially resource-specific
 - Prescribed by multiple FERC tariffs
- Current gas transport component of proxy SU/ML
 - Based on PG&E, SCE and SDG&E rates
 - Includes a 10% adder to account for other additional costs
- The ISO proposes not to change this
 - The 10% adder in addition to more granular gas delivery point prices should improve participants' ability to recoup gas transport costs



Opportunity Costs for Use-Limited Resources

- Methodology for valuing run-hours for use-limited resources
 - Forecasted prices
 - Historical energy and gas prices used to derive an implicit heat rate
 - Heat rate applied to forward energy and gas prices
 - Price duration curve
 - Ranks prices by the number of hours in which they occur
 - As run-hours get scarcer, value increases
- Adapting the methodology for start-ups of use-limited resources
 - Monthly updates to annual use-limitation plans
 - Weekly break-outs?



Example of Opportunity Cost valuation

- Maximum of 120 run-hours, maximum MWh is 15,000 and estimates 10 starts for the month
- 10 starts lasting is estimated to be 12 hours at 125MWh
- Take the 120 highest forecasted prices for the month and rank them by frequency
- The first start is the value of the sum of the 12 most frequent prices (p1*125 + p2*125 + ... + p12*125)
- The tenth start is the value of the sum of the 12 least frequent prices (p109*125 + p110*125 + ... + p120*125)



Multi-Stage Generating Resource Background

MSG Resources

- Units with multiple configurations
- Only one configuration operates at a time

Transition Matrix

- Maps costs and operating parameters associated with transitioning between configurations
- Transition costs are static in the Master File for 30 days



MSG Transition Matrix

	"To" Configuration				
		Offline	1	2	3
"From" Configuration	Offline		\$	\$	\$
			minUp	minUp	minUp
			minDown	minDown	minDown
		\$		\$	\$
	1	minUp		minUp	minUp
		minDown		minDown	minDown
		\$	\$		\$
	2	minUp	minUp		minUp
		minDown	minDown		minDown
	3	\$	\$	\$	
		minUp	minUp	minUp	
		minDown	minDown	minDown	



MSG Transition Costs

Design principles

- Prevent economic withholding
- Provide flexibility
- Avoid rigid rules
 - Difficult to prescribe parameters
 - Onerous to validate data
- How TC are different from SU costs
 - Unidirectional
 - Widely varied sources of costs
 - Explicit downward transition costs



MSG Transition Cost Rules

- maxSU: \$ value of going from offline to the highest or most expensive configuration – Negotiated
- Rule 1: The sum of costs from offline to the pmax of the maxSU configuration back to offline must be between 50% and 150% of maxSU
- <u>Rule 2</u>: For any feasible transition from i→j, feasible transitions that nest within it must be between 50% and 150% of the cost of the transition from i→j



MSG Transition Cost Rule Examples

Rule 1: The sum of costs from offline to the pmax of the maxSU configuration back to offline must be between 50% and 150% of maxSU

Example:

- maxSU = \$18,000 (associated with configuration 4)
- SU = \$10,000
- Transition $1 \rightarrow 2$ has TC = \$5,000
- Transition $2 \rightarrow 4$ has TC = \$7,000
- Transition $4 \rightarrow 3$ has TC = \$1,000
- Transition $3 \rightarrow 1$ has TC = \$1,500
- $SU + TC(1 \rightarrow 2) + TC(2 \rightarrow 4) + TC(4 \rightarrow 3) + TC(3 \rightarrow 1) = $24,500$
- 150% of maxSU = \$27,000 > \$24,500 so it PASSES Rule 1



MSG Transition Cost Rule Examples

■ <u>Rule 2</u>: For any feasible transition from i→j, feasible transitions that nest within it must be between 50% and 150% of the cost of the transition from i→j

Example:

- Transition $1 \rightarrow 4$ has TC = \$8,000
- Transition $1 \rightarrow 2$ has TC = \$6,000
- Transition $2 \rightarrow 4$ has TC = \$7,000
- Look at TC(1→2) + TC(2→4) to make sure it is between 50% and 150% of TC(1→4)
- \$6,000 + \$7,000 > 150% of \$8,000
- These transition costs FAIL Rule 2



Commitment Costs Stakeholder Process

DATE	EVENT		
March 16	Straw Proposal posted		
March 19	Market Surveillance Committee Meeting		
March 24	Conference call		
April 2	Stakeholder comments due		
April 7	Draft Final Proposal posted		
April 14	Call to answer any remaining questions		
April 22	Final SH comments due		
May 17-18	CAISO Board of Governors		



Questions, Comments, Concerns & Compliments...

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