

Stakeholder Comments Template

Subject: HASP AS Draft Tariff Language

Submitted by	Company	Date Submitted
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Powerex appreciates this opportunity to provide comments on the HASP Draft Tariff Language.

Powerex has these suggested edits to the Draft Tariff Language as follows:

- In 8.3.1, the phrase “intertie schedules for the Operating Hour” is repeated; suggest deleting the second occurrence as follows:
 - “...The amount of additional Ancillary Services procured in the HASP is based on the CAISO Forecast of CAISO Demand, the Day-Ahead Schedules established net interchange, and the forecast of the intertie schedules for the Operating Hour in the HASP ~~[intertie schedules for the Operating Hour]~~ net of (i) available awarded Day-Ahead Ancillary Services...”;
- In 8.7, minor typo “...no later than he publication...” should be “no later than the publication...”;
- In 11.10.1.2, suggest the following edit:
 - “...The CAISO charges Scheduling Coordinators that receive an Ancillary Service Award or have qualified Self-Provided Ancillary Services at a Scheduling Point Scheduling Point in HASP the simple average of the fifteen (15) minute Marginal Cost of Congestion over the applicable Trading Hour as described in Section 11.10.1.2.1.”;
- In 11.10.1.2.1, suggest the following edit:
 - “...The charge for Congestion at such locations is equal to the simple average of the fifteen (15) minute applicable intertie constraint Shadow Price ~~[for the market]~~ over the applicable Trading Hour at the location that the Ancillary Service is awarded, multiplied by the quantity of Ancillary Services Award or the capacity of the qualified Self-Provided Ancillary Service for the Settlement Period.”;
- In 27.1.2.2, suggest the following edit:
 - “...For Non-Dynamic System Resources that receive Ancillary Services Awards in HASP, the opportunity cost measured for this purpose is \$0 because, as provided in Section 33.7, the CAISO cannot Schedule Energy in HASP from the Energy Bid under the same Resource ID as the submitted Ancillary Service Bid.”;

- In 30.5.2.6, suggest deleting Hourly:
 - As described in Section 33.7, if the resource is a Non-Dynamic **Hourly** System Resource, the CAISO will only use the Ancillary Services Bid in the HASP optimization and will not use the associated Energy Bid for the same Resource ID to schedule Energy from the Non-Dynamic **Hourly** System Resource in the HASP.”;
- In 30.7.6.1, suggest the following edit:
 - “...As provided in Section 33.7, for Non-Dynamic System Resources the CAISO will not use the associated submitted **Energy Bid** or Generated Bid for the same Resource ID in the HASP optimization.”;
- In 30.7.6.2, suggest the following two edits:
 - “...In the HASP, the CAISO will not consider Energy Bids **from Non-Dynamic System Resources** submitted in association with Ancillary Services Bids under the same Resource ID in the HASP optimization. A Scheduling Coordinator may specify that its Bid applies only **to** the markets it desires.”;
- In 33.7, suggest the following edit:
 - “...Generating Units and **Dynamic** System Resources designated in the HASP to provide Ancillary Services for the same Trading Hour receive non-binding advisory Ancillary Services awards because the CAISO will re-optimize the use of these Generating Units and Dynamic System Resources to provide Ancillary Services in a subsequent RTUC run, as described in Section 34.2.”; and
- In 33.8, suggest the following minor edits:
 - “...The CAISO uses these fifteen (15) minute ASMPs to derive **[an] a simple** average hourly price for the Settlement of hourly HASP AS Awards. The RTUC run will also produce fifteen (15) minute Shadow Prices for each of the Intertie constraint for the four (4) fifteen (15) minute intervals for the applicable Trading Hour. These fifteen (15) minute Shadow Prices are then used to derive **[an] a simple** average hourly price for charging hourly Intertie AS Awards providers for Congestion at the applicable intertie.”