

Western Power Trading Forum Comments on Transmission Constraint Tariff Language

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WPTF appreciates the opportunity to submit comments on the CAISO's draft tariff language. We offer the following feedback.

1. More detail is needed in the tariff language describing the transmission constraint information that the CAISO will provide. The CAISO's stakeholder process proposal includes specific tables that detail the data the CAISO will provide. The tariff language should describe the types of constraint information the CAISO will provide.
2. The CAISO has provided a new defined term in Section 6.5.3.3.1 – Transmission Constraints Enforcement List – but does not seem to provide the definition. This definition may be an appropriate place to provide the type of information that corresponds to the Enforcement, as we request in item 1, above.
3. While the CAISO has proposed to modify section 6.5.3.2.2 for information provided at the close of the DA market, no corresponding tariff revision has been offered for the transmission constraint information that was to be provided prior to the conduct of the market. That revision is still needed.
4. The timing for release of the CRR model and FNM should be added to the FNM and CRR parts of the tariff language.
5. In draft section 6.5.3.3.1 the CAISO has proposed the clause: "that satisfy the following requirements and any related procedures set forth in the Business Practice Manual". All necessary tariff-level requirements should be specified in the tariff and the BPM requirements should only be implementing details for the tariff requirements. The CAISO should thereby strike the phrase "and any related procedures set forth in the Business Practice Manual" and instead include any additional requirements that are necessary within the tariff language itself.