# Draft Final Proposals on CRR Enhancements



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# The CAISO is finalizing proposals on these CRR-related policy issues.

- CRR Year 2 Release Process
- MW Granularity of CRR Tracking
- The "30-day Rule" for Scheduling Transmission Outages
- Monthly CRR Eligibility for LSEs Without Verifiable Load Forecasts
- CRR Credit Policy Enhancements
  - Credit Policy for CRR Transfers Associated with Load Migration
  - Credit Requirement for Holding Short-Term CRRs
  - Pre-Auction Credit Margin Requirement



# Stakeholder Process that has developed these CRR policy enhancements.

- March 25 Issue Papers posted
- April 1 Stakeholder meeting
- April 8 Initial Stakeholder comments posted
- April 14 Straw Proposals on these CRR issues posted
- April 21 Stakeholder Conference Call
- April 28 Stakeholder comments on Straw Proposals posted
- May 6 Draft Final Proposal on CRR Issues posted
- May 12 Stakeholder Conference Call
- May 21-22 Final Proposal presented to CAISO Board of Governors



#### Additional Key Dates for Stakeholder Review of draft Tariff Language on these CRR Issues

- May 9 CAISO posts <u>draft</u> Tariff Language
- May 19 Stakeholder written comments due (on draft Tariff Language) to <u>MRTUTariff@caiso.com</u>
- May 23 Stakeholder conference call to review draft Tariff Language (10:00 am – 1:00 pm)
- May 30 Filing to FERC on CRR Issues



#### **Tentative Schedule for Source Submittal and Verification in the next Annual CRR Allocation**

- CAISO anticipates collecting and verifying LSEs' submitted sources for Season 1 (January through March 2009) based on historic reference period of first quarter 2007.
- The CAISO will collect and verify Out of Balancing Authority Area Load Serving Entities (OBAALSEs) submitted sources for Season 1 through 4 (January to December 2009) based on a forward looking reference period of 2009.
- Tentative Schedule:
  - Collection of 2009 Source Data Templates and Declarations will begin on July 1, 2008 and end at close of business July 14, 2008.
  - Verification of source submittals will begin on July 15, 2008 and end at close of business August 4, 2008.
  - Source Upper Bounds (including PNP information) will be provided to allocation participants on August 21, 2008 via the CRR Market User Interface.



## Schedule for next Annual CRR Release (for CRRs effective in 2009)

## **Allocation**

The 2009 Annual CRR Allocation begins on August 8, 2008 and ends on October 31, 2008.

#### Historical Load Submittal

- Opens August 8, 2008 at 0100
- Closes August 14, 2008 at 1700

#### \* Priority Nomination Tier (for Quarters 2,3,4)

- Opens September 3, 2008 at 0100
- Closes September 5, 2008 at 1700
- Results posted by 1700 on September 12, 2008

#### \* Tier 1 (for Quarter 1)



## Schedule for next Annual CRR Release (for CRRs effective in 2009)

#### Allocation (continued)

#### Tier 2

- Opens September 18, 2008 at 0100
- Closes September 22, 2008 at 1700
- Results posted by 1700 on September 29, 2008

#### Tier Long Term

- Opens October 7, 2008 at 0100
- Closes October 10, 2008 at 1700
- Results posted by 1700 on October 17, 2008

\* (LT-CRR nominations must come from Tier 1 or PNP for Q2-4. LT-CRR nominations can come from Tier 1 or Tier 2 for Q1)

#### Tier 3

- Opens October 22, 2008 at 0100
- Closes October 24, 2008 at 1700
- Results posted by 1700 on October 31, 2008



## Schedule for next Annual CRR Release (for CRRs effective in 2009)

# <u>Auction</u>

Bidding Window opens November 7, 2008 at 0100

Bidding Window closes November 12, 2008 at 1700

Results posted by 1700 on November 19, 2008



# **Draft Final Proposals for the CRR Year 2 Release Process**

# CRR Source Verification for Quarter 1 2009

 Season 1 CRRs were not released for 2008 and therefore not source verified.

- Draft Final Proposal: 2007 Quarter 1 should be the reference period for verifying Season 1 source nominations.
  - More recent source verification information better matches grid usage.



# Draft Final Proposals for the CRR Year 2 Release Process (continued)

- Impact of MRTU Delay on CRRs for Quarters 2 and 3 2009
  - First annual release of 2008 CRRs verified sources for Seasons 2, 3, and 4, but:
    - CRRs for Seasons 2 and 3 will not be in effect during actual MRTU market operation.
- Draft Final Proposal: Treat CRR Seasons 2 and 3 as "Year 2" seasons that are eligible for the Priority Nomination Process.
  - No need to "re-do" source verification.
  - Avoids potential impact on LT-CRRs that were already allocated for Seasons 2 and 3.



# Draft Final Proposals for the CRR Year 2 Release Process (continued)

## CRRs for 2009 Quarter 4

- Previously released CRRs for Season 4 were source verified.
- Assuming MRTU "Go Live" in 2008, these "Year 1" CRRs for Season 4 will be in effect during actual MRTU market operation.
- Draft Final Proposal: CAISO confirms these CRRs for Season 4 should be eligible for Priority Nomination Process in the next annual release (for 2009 CRRs.)



# Draft Final Proposals for the CRR Year 2 Release Process (continued)

### Treatment of Long-Term CRRs

- Q2 and Q3 LT-CRRs will not be effective in 2008; thus, these LT-CRRs will have nine year durations.
- Staggered Increase in LT-CRR Availability
  - *MRTU Tariff Section 36.8.3.1.3.1*:
    - In "CRR Year One," LSEs can nominate no more than 20% of its Adjusted Load Metric for LT-CRRs (unless 10-year or longer contracts are demonstrated.)
  - *MRTU Tariff Section 36.8.3.5.2.1*:
    - In "CRR Year 2," LSEs can nominate no more than **30%** of its Adjusted Load Metric for LT-CRRs (unless 10-year or longer contracts are demonstrated.)
    - In "CRR Year 3," LSEs can nominate no more than 40% of ALM...
    - In "CRR Year 4" and beyond, LT-CRR limitation is 50% of ALM ...
- Draft Final Proposal: CAISO confirms Q1 LT-CRRs should be treated under "Year 1" limit, and Q2-4 LT-CRRs should be treated under "Year 2" limit.



# Draft Final Proposal for MW Granularity of CRRs

Currently the minimum denomination of CRRs is 0.1 MW.

- Solution Straight Straight
  - Will be applicable for CRR nominations in the allocation and auction processes.
  - This granularity threshold will be configurable and could be modified in the future.



### Draft Final Proposal on 30-Day Rule on Outage Scheduling

- The 30-Day Rule requires PTOs to schedule "significant outages" with the CAISO at least 30 days prior to the month in which the outage will occur.
  - Current rule exempts outages initiated and completed within a single calendar day.
- Draft Final Proposal: Modify this rule so that outages initiated and completed within a 24-hour period are exempt (instead of one calendar day).
  - This modification will be reflected in the next revision of the BPM for CRRs.



# Draft Final Proposal on 30-Day Rule on Outage Scheduling (continued)

- CRR BPM Sec. 10.3.1 provides process for PTOs to submit facilities they wish to exempt from 30-Day Rule.
  - To gain exemption, an outage must have no impact on shift factors or constraint limits in the FNM.

- Draft Final Proposal: The CAISO will eliminate these exemption provisions in the next revision of the BPM for CRRs.
  - New criteria for exemptions can be developed as actual LMP market experience unfolds.



### Draft Final Proposal on 30-Day Rule on Outage Scheduling (continued)

- Approximately 6 months after MRTU start-up, the CAISO will begin empirical assessment of effectiveness of outage modeling approach and 30-day rule.
  - Develop empirical basis for assessing impacts of outages on CRR revenue adequacy.
  - Consider potential modifications to exemption policy after 12 months of market operation under LMP.
- Draft Final Proposal: The CAISO commits to:
  - developing an analytical methodology for assessing the impacts of outages on CRR revenue adequacy.
  - assessing (with stakeholders) whether revisions to the 30-day rule exemption policy are appropriate.



#### Draft Final Proposal on Monthly CRR Eligibility for LSEs Without Verifiable Load Forecasts

- Each month LSEs provide a load forecast so the CAISO can determine their eligibility for monthly CRRs.
- The load forecast is verified against the load forecast used for RA purposes and adjusted if necessary for consistency.
- Draft Final Proposal: In the absence of a verifiable load forecast, the CAISO will use up to five years of previous historical load of the same month.
  - For each TOU and sink, a load metric for each of the five relevant months will be computed. Then the five load metrics will be averaged.
  - If five years historical data are not available, CAISO will utilize as many years as are available.

