# CRR Credit Policy Enhancements Straw Proposals



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### Agenda

- Straw Proposals for May Board Decision
  - 1. Credit Policy for CRR Transfers with Load Migration
  - 2. Credit Requirement for Holding Short-Term CRRs
  - 3. Pre-Auction Credit Margin Requirement
- Issues Deferred to Future Stakeholder Processes
  - 4. Reassessment of Credit Coverage for Long-Term CRRs
  - 5. Methodology to Calculate CRR Credit Requirements due to Extraordinary Circumstances
  - 6. Corporate Credit Backing of Affiliates



# Enhancement 1 – Credit Policy for CRR Transfers with Load Migration

- Currently, upon load migration,
  - CRRs associated with migrated load must be transferred to the load gaining LSE; and
  - Load-losing LSE will be assigned counter-flow CRRs to offset the CRRs to be transferred with load.
- Current credit policy allows netting in CRR holding requirement
- Issue: Load-losing LSE may not have financial capability to cover the assigned counter-flow CRRs, because prior to load migration
  - It may have already sold the allocated CRRs; or
  - It may have procured offsetting counter-flow CRRs.



## **Enhancement 1 – Continued**

#### Straw Proposal:

- Disallow netting between allocated CRRs and auctioned CRRs in the credit holding requirement calculation, and
- Require LSEs selling allocated CRRs to maintain sufficient credit coverage to cover the counter-flow CRRs that offset the CRRs being sold.



# Enhancement 2 - Credit Requirement for Holding a Short-Term CRR

Currently,

Credit Requirement = - Auction Price + Credit Margin

Straw Proposal: Credit Requirement

- = min (Auction Price, Historical Expected Value)
- + Credit Margin
- Historical Expected Value will be based on historical market operation data consistent with the calculation of Credit Margin for each month; The proposed enhancement will take effect one year after the start-up of MRTU.



# Enhancement 3 – Pre-Auction Credit Margin Requirement

- Currently, minimum credit requirement for participating in auction:
  - Max (\$500,000, sum of the absolute value of the bids)
  - Based on bid prices; does not include Credit Margin
- Credit Margin is part of the CRR holding requirement to cover the volatility of the underlying values of the CRRs

#### Issue:

 An auction participant could win CRRs, but may not be able to cover its CRR holding requirements, and its preauction credit may not be sufficient.



### **Enhancement 3 – Continued**

Most stakeholders support the inclusion of the full Credit Margin in the bidding requirement.

#### Straw Proposal:

Add full Credit Margin to pre-auction credit requirement

$$\max[\$500,000, \sum_{CRR_i} (|bid price_i| + Credit Margin_i \times MW_i)]$$



## **Other Issues Deferred to Future Stakeholder Processes**

- Reassessment of Credit Coverage for Long-Term CRRs
  - This issue is included in the Market Initiatives Roadmap to be considered injunction with the LT-CRR auction.
- Methodology to Calculate CRR Credit Requirements due to Extraordinary Circumstances
  - Future stakeholder process date to be determined.
- Corporate Credit Backing of Affiliates
  - The CAISO will address this issue within the upcoming stakeholder process for other general credit policy issues later this year.





Please submit written comments by April 28, 2008 to <u>CRRComments@caiso.com</u>

using the stakeholder comment template posted at

http://www.caiso.com/1b8c/1b8cdf25138a0.html

