

Western Power Trading Forum Comments on Proposed Generation Deliverability Assessment Methodology

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The Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

Comments

WPTF appreciates the opportunity to submit comments on the CAISO's Generation Deliverability Assessment Methodology discussed on the December 18 stakeholder call. WPTF recognizes that the system needs have changed since the original methodology was implemented and supports the CAISO's efforts to better align the assessment of deliverability with actual system needs. However, WPTF believes additional discussions would be beneficial to ensure all stakeholders fully understand the implications of what is being proposed. For the reasons discussed below, WPTF encourages the CAISO to conduct another technical workshop in Q1 of 2019 before moving forward with the proposed changes.

Detailed Comments

WPTF appreciates the CAISO presenting a comparison analysis looking at the impact this change will have on transmission upgrades. The analysis was extremely thorough and informative for transmission planning purposes. As noted by the CAISO on the stakeholder call, this modification will also have an impact on the energy market itself. There will be increased renewable energy curtailments, shifts in congestion and thus energy prices, and may also push approval of transmission upgrades from the Generation Interconnection Procedures (GIP) to the TPP. It is also unclear to WPTF the exact impact this will have on both existing and future resources from a resource adequacy perspective. Therefore, it would be extremely beneficial for the CAISO to present the material outside the context of the transmission planning process cycle.

This proposed change was initially discussed within the Transmission Planning Process stakeholder process but appears to have implications beyond transmission planning. WPTF is concerned that not all stakeholders that will be impacted by this proposal are aware of the change. Thus, WPTF asks that the CAISO ensure all relevant stakeholders are informed of this proposal and hold another technical workshop with a broader group of stakeholders.

WPTF thanks the CAISO for consideration of our comments.