

Western Power Trading Forum (WPTF) comments on CAISO 03/04/10 Post 5-Day Correction Issue Paper and 03/19/10
Addendum
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WPTF appreciates the opportunity to submit these comments.

WPTF generally supports the CAISO's revised approach put forth in the March 19 addendum. Not having a de-facto process for correcting prices removes the ambiguity and uncertainty and provides assurance of due process if a change is warranted and requested at FERC by the CAISO. For these reasons we view the CAISO's proposed addendum as a positive refinement.

WPTF also supports the CAISO's proposal to issue a technical bulletin when errors are identified. It is critical that the CAISO inform market participants as soon as the CAISO is aware of an error that was not corrected within the 5-day window. Full disclosure about pricing errors is important even if prices are not corrected retroactively. We ask the CAISO to confirm that it will immediately notify market participants when pricing errors are discovered.

Lastly, WPTF supports the CAISO's ability to continue to make adjustments to resource-level compensation as part of the dispute process.

There are two points to which WPTF requests clarification and/or refinement to the process as proposed in the CAISO's addendum.

- First, the CAISO outlines (page 3) an orderly process to pursue when issues arise. Please clarify that the CAISO intends to follow this orderly process (short of filing for a waiver) even if it ultimately determines that a FERC waiver will not be sought.
- Second, WPTF continues to encourage the CAISO to inform the CAISO board when errors are found in the prices, and we would like the CAISO to clarify whether board authorization will be sought if the staff determines it should file for a waiver and/or whether the board will be informed even if the CAISO does not recommend seeking a waiver. Once the CAISO has clarified its proposal on this point another round of discussion with stakeholders may be productive.

We appreciate the CAISO's consideration of these comments.