

## **Stakeholder Process: Multi-Stage Generating Unit Modeling Enhancements**

### **Summary of Submitted Comments**

**Stakeholders submitted four rounds of written comments to the ISO on the following dates:**

- Round One: July 14, 2011
- Round Two: August 19, 2011
- Round Three: September 26, 2011

This matrix summarizes the most recently submitted stakeholder comments.

**Stakeholder comments are posted at:** <http://www.caiso.com/informed/Pages/StakeholderProcesses/Multi-StageGenerationEnhancements.aspx>

**Other stakeholder efforts include:**

- Stakeholder Conference Call: July 1, 2011
- Stakeholder Conference Call: August 12, 2011
- Stakeholder Conference Call: September 16, 2011

Management Proposal	Calpine	PG&E	SCE	SDG&E	CDWR	Management Response
Increase in the number of configurations that can be bid into the real-time market; limitation on the number of transition paths between MSG configurations for those with 7-10 registered configurations	Supports all elements of the proposal	Supports all elements of the proposal	Either supports or does not oppose each element of the proposal	Either supports or does not oppose each element of the proposal	Supports	
Requirement to bid in capacity between plant-level minimum load and the higher of the resource's resource adequacy capacity or its highest bid-in capacity						
Increase from 1 to 2 ramp-rates can be registered per MSG configuration						
Ability to self-schedule in real-time in a different configuration than day-ahead self-scheduled configuration						
In calculation of bid-cost recovery, use the minimum load costs for the highest configuration for which the resource achieves its minimum load when dispatched upward. When dispatched downward, minimum load costs considered for bid cost recovery are those of the target configuration		Requests additional technical documentation of MSG software improvements. The ISO has provided the requested documentation.			CDWR is concerned this could increase bid cost recovery payments.  Encourages the ISO to monitor submitted minimum load costs.	While overall bid-cost recovery payments will likely increase, this change aligns accounting for multi-stage generating resources' minimum load costs with that of other resources.  The ISO proposes to continue the enforcement of existing rules with respect to allowable minimum load costs.
No change from the current transition cost validation rules					Supports	The change to transition cost validation rules was removed from the proposal based on stakeholder feedback.