

Bonneville Power Administration CAISO FERC Order 764 compliance 15-minute scheduling and settlement Straw Proposal Comments (Round 2)

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Overview: BPA appreciates the opportunity to provide comments on the CAISO's initial straw proposal on FERC Order 764 compliance 15-minute scheduling and settlement. BPA believes the market design, tagging and transmission operations and scheduling aspects of the 15-minute market proposal will have significant implementation and participation implications for CAISO and for the adjacent balancing authority areas. BPA is interested in hearing back from the CAISO regarding the specific questions we've included in our comments below. BPA looks forward to further dialogue on this proposal.

1. Scheduling Comments

- 1.1. BPA is seeking clarification on CAISO curtailment process due to in-hour derates. If CAISO has a derate within the operational hour, will CAISO curtail e-tags to the "next schedule Interval" or curtail to the end of the operational hour? Example: If the COI was derated from 4800 to 2990MW at XX:10, will the CAISO curtail e-tags starting current time and end at XX:15 or will they curtail e-tags at current time and end at XX:00 (top of hour)? BPA suggests that the CAISO curtailment process follow the anticipated guidelines of the preemption sub-group of the WECC 764 task force.
- 1.2. How does the CAISO see its new 15 min. market be impacted due to derates within the hour? BPA suggests that the ISO incorporate the most recent line ratings in its market optimization.
- 1.3. Is CAISO expecting to make changes to its COI Master Operating Procedure 6110? BPA suggests that an evaluation of the COI Master Operating Procedure 6110 be conducted prior to finalization of the proposal process.