

May 15, 2019

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: California Independent System Operator Corporation  
Docket No. ER15-861-\_\_\_\_  
Energy Imbalance Market – First Quarter 2018  
Available Balancing Capacity Report**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its quarterly informational report for the first quarter of 2018 (January 1 to March 31, 2018) on the Available Balancing Capacity (ABC) enhancement for the western Energy Imbalance Market (EIM). The quarterly informational report is to provide the Commission with information on the performance of the ABC enhancement and to provide the same information the CAISO provides in its monthly informational reports submitted during an EIM entity's first six-month transition period.

Consistent with the Commission's directive in the December 17, 2015 order, the CAISO will continue to file such quarterly reports for at least the first year after implementation of the ABC enhancement, or until the Commission finds the quarterly informational reports are no longer needed.

Please contact the undersigned with any questions.

Respectfully submitted

**By: /s/ Anna A. McKenna**

Roger E. Collanton  
General Counsel  
Anna A. McKenna  
Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 608-7182  
Fax: (916) 608-7222  
[amckenna@caiso.com](mailto:amckenna@caiso.com)



# California ISO

**Energy Imbalance Market**

**January 1 – March 31, 2018**

**Available Balancing Capacity Report**

May 15, 2019

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## I. Background

On December 17, 2015, the Federal Energy Regulatory Commission (Commission) approved the California Independent System Operator Corporation's (CAISO) proposed tariff revisions to comply with the Commission's July 20, 2015 order in FERC Docket No. ER15-861-006.<sup>1</sup> The CAISO's proposed tariff provisions enhanced the western Energy Imbalance Market (EIM) functionality so that the market systems automatically recognize and account for capacity an EIM entity has available to maintain reliable operations in its own balancing authority area (BAA), but has not been bid into the EIM.<sup>2</sup> This enhancement is referred to as the Available Balancing Capacity (ABC) enhancement. The CAISO implemented the ABC enhancement on March 23, 2016.

Consistent with the CAISO's commitments made in this proceeding, the Commission directed the CAISO to prepare and file with the Commission quarterly informational reports for at least the first year after implementation of the ABC enhancement, and until the Commission finds the quarterly informational reports are no longer needed.<sup>3</sup> The quarterly informational reports are to provide information on the performance of the ABC enhancement and to include the same information the CAISO provides in its monthly informational reports submitted during an EIM entity's first six-month transition period.<sup>4</sup>

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<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,060 (2015) (July 20 Order); and *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61, 305 (2015) (December 17 Order).

<sup>2</sup> December 17 Order at P 1.

<sup>3</sup> December 17 Order at P 99

<sup>4</sup> December 17 Order at P 39.

## II. Highlights

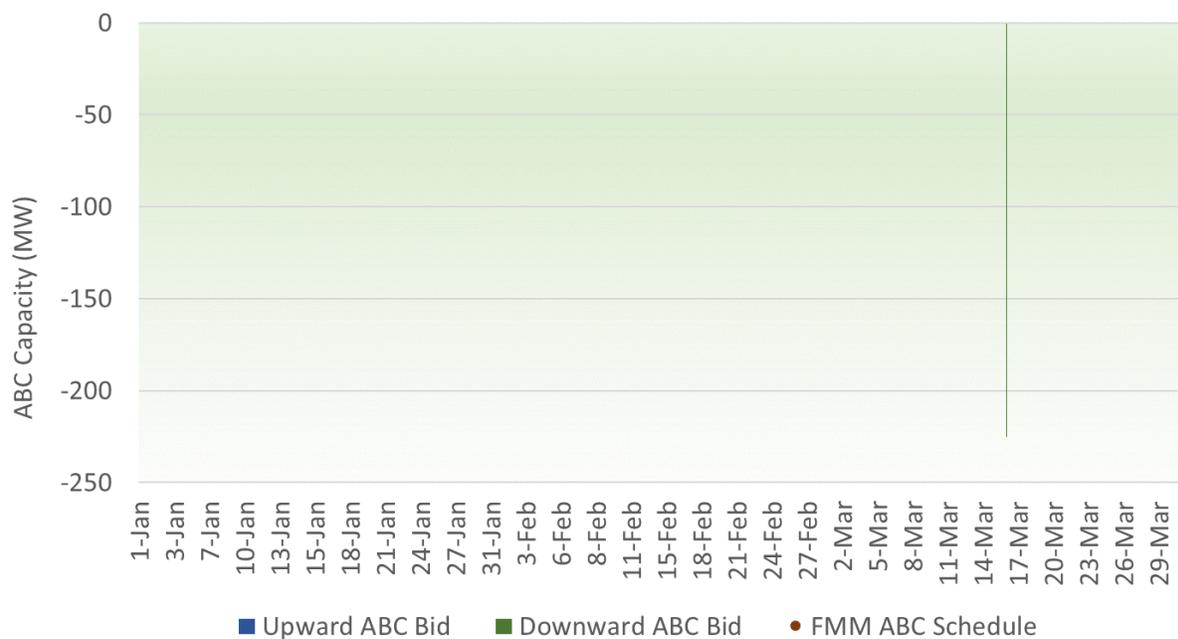
- The CAISO implemented the ABC enhancement on March 23, 2016. During the first quarter of 2018, the Portland General Electric (PGE) BAA was under the transitional period with tariff provisions for price discovery.
- The NV Energy and Puget Sound Energy (PSE) BAAs submitted ABC in nearly all intervals of the first quarter of 2018, with modest ABC submissions by the PacifiCorp East (PAC East) BAA; this contrasts with the lower frequency of ABC submitted by other EIM entities.
- The EIM dispatched ABC, in either upward or downward direction very infrequently, as high as 6.19 percent for the Arizona Public Service (APS) BAA, but as low as zero percent in other EIM entity's BAAs.
- The APS BAA used as many as seven different resources to support their ABC submissions.
- Overall, the impact of ABC was low, based on the relative low frequency of scheduling and availability when power constraint infeasibilities were observed.

### III. Available Balancing Capacity

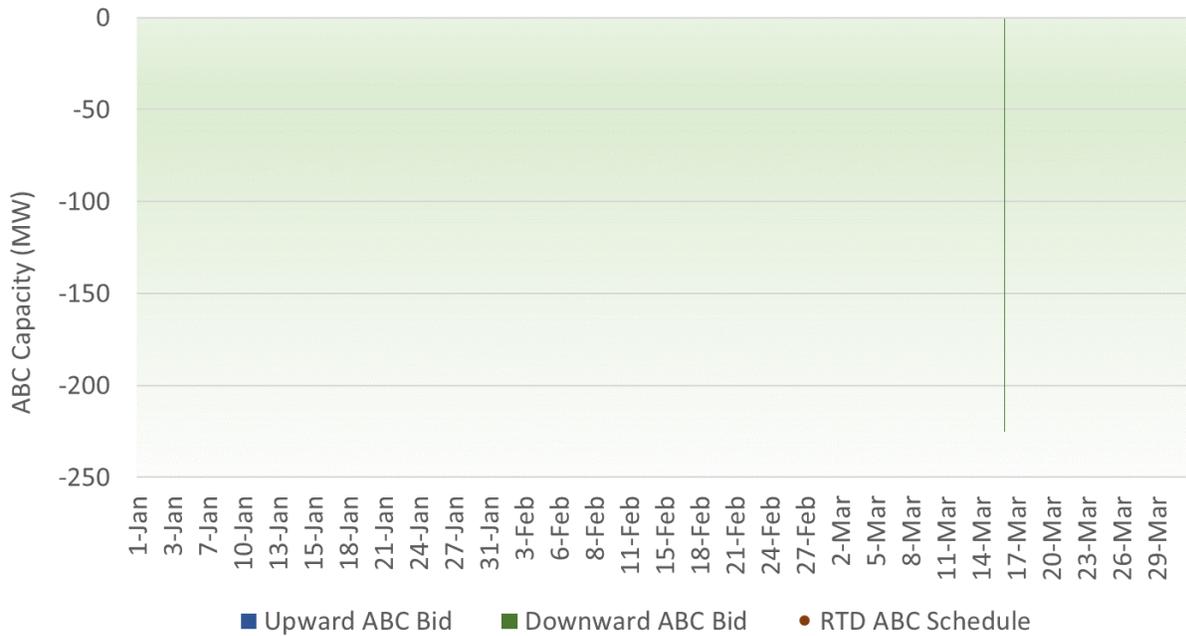
#### A. Available Balancing Capacity Submitted to the Market

Each EIM entity can identify and set the amount of ABC it will make available to the CAISO and the resources supporting this capacity through its EIM entity’s resource plan. The EIM entity submits this capacity to the CAISO on an hourly basis, and it is available for both the Fifteen-Minute Market (FMM) and the five-minute Real-Time Dispatch (RTD). Figures 1 through 10 show the ABC made available in each EIM entity’s BAA. PacifiCorp West (PAC West), PAC East, NV Energy, APS, PSE; PGE did not submit any ABC bids in the first quarter of 2018, and thus no graphs are included below. For each EIM entity BAA, there are two plots to show the amount of ABC dispatched in the FMM and RTD, separately. The blue bars indicate positive values and illustrate the upward ABC made available by the EIM entity; the green bars indicate negative values and illustrate the downward ABC made available. Red markers indicate the instances where the ABC was dispatched in either the upward or downward direction.

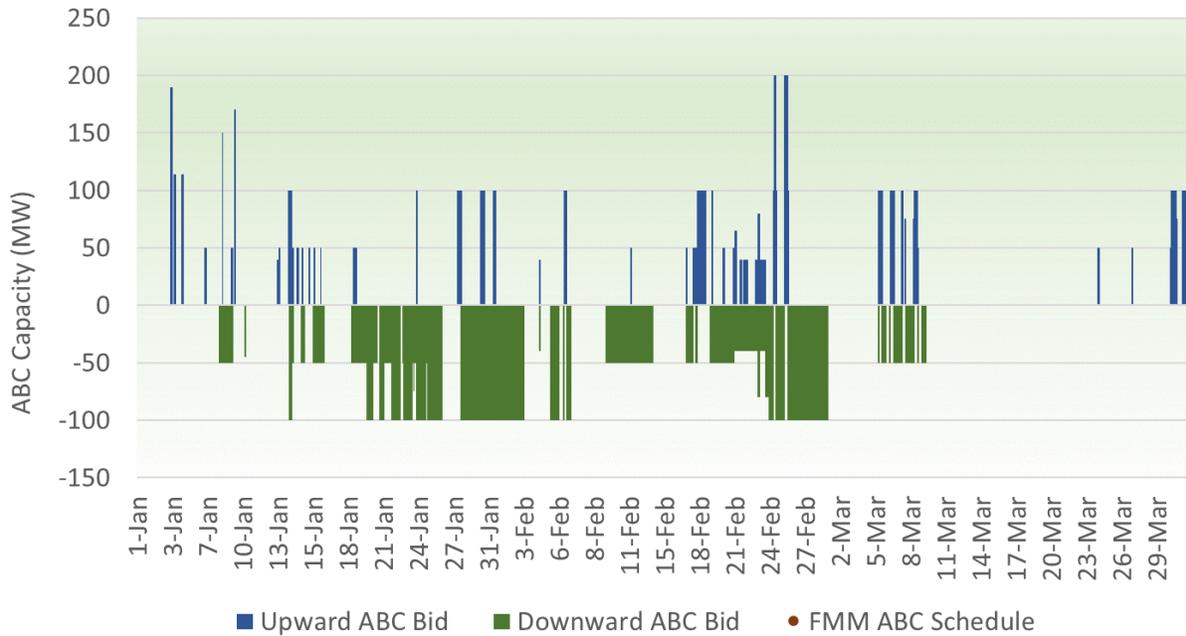
**Figure 1: Submitted and Dispatched ABC in the PAC West BAA – FMM**



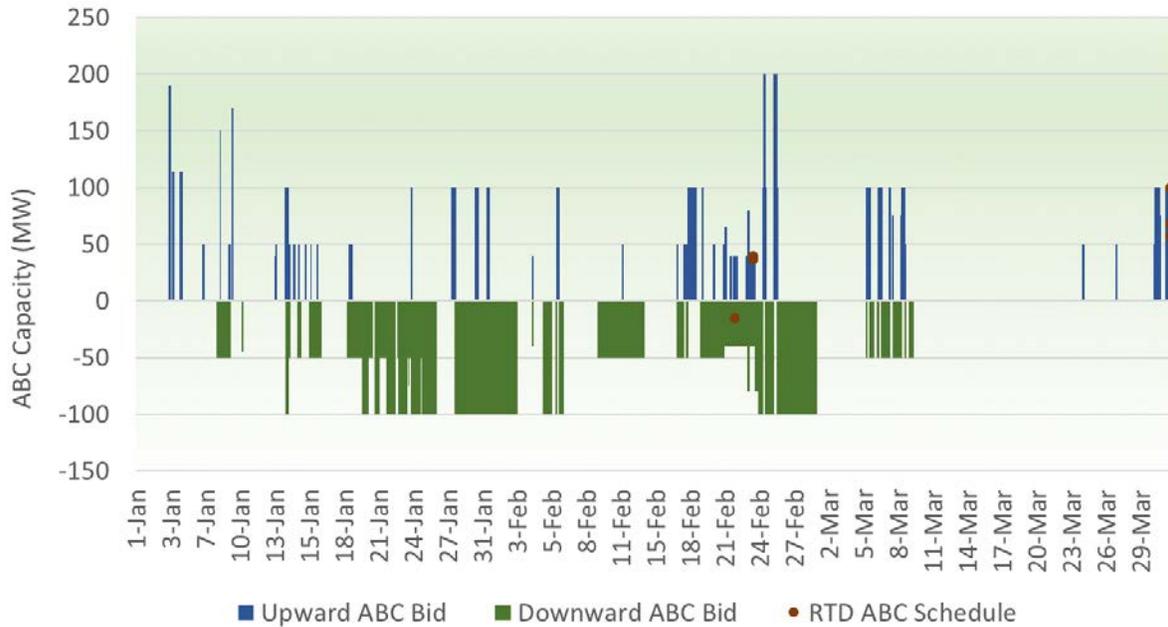
**Figure 2: Submitted and Dispatched ABC in the PAC West BAA – RTD**



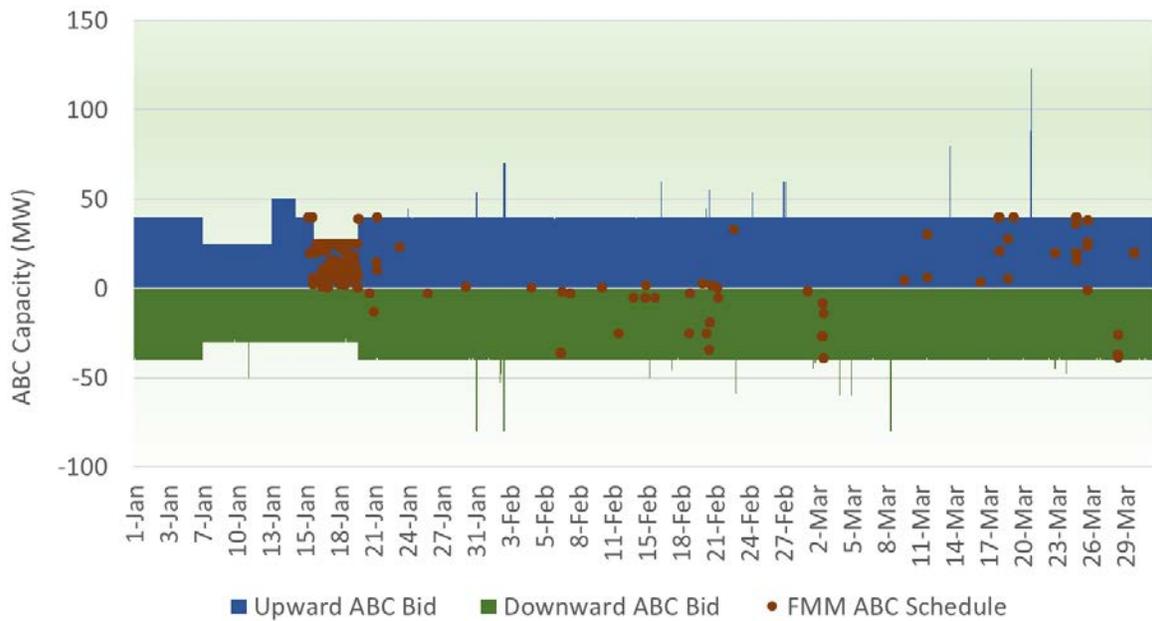
**Figure 3: Submitted and Dispatched ABC in the PAC East BAA – FMM**



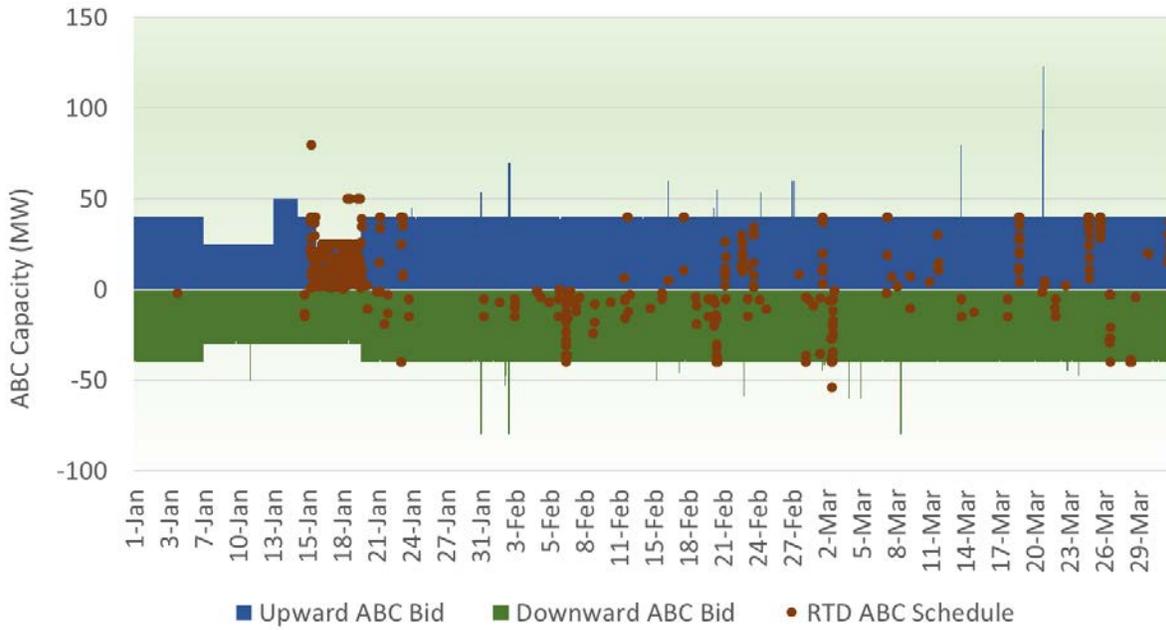
**Figure 4: Submitted and Dispatched ABC in the PAC East BAA – RTD**



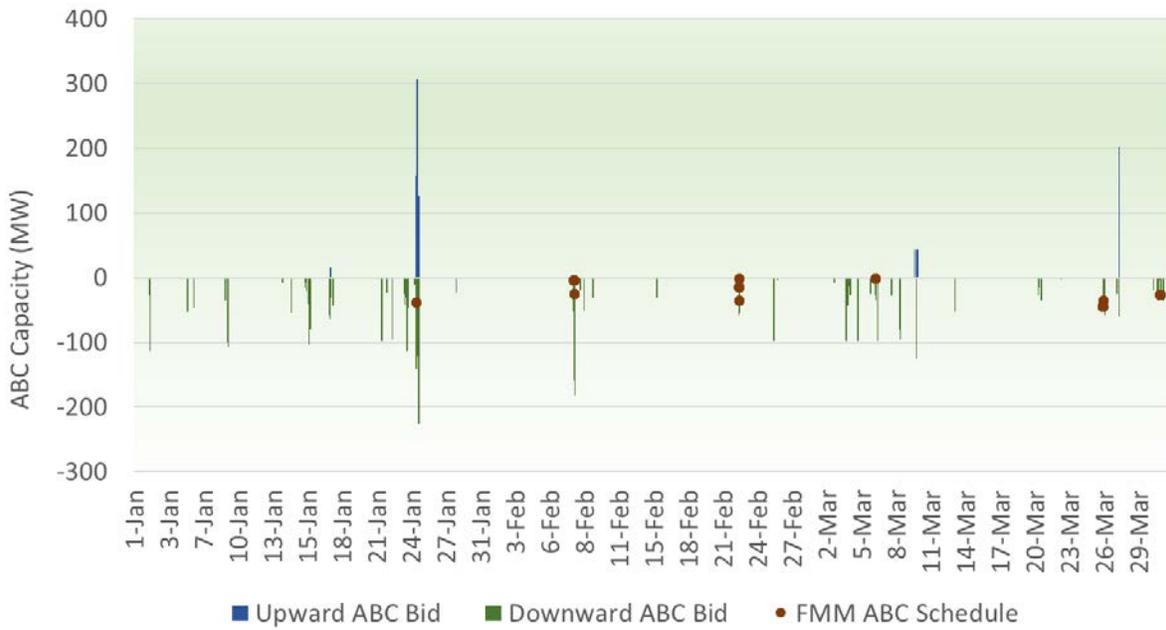
**Figure 5: Submitted and Dispatched ABC in the NV Energy BAA – FMM**



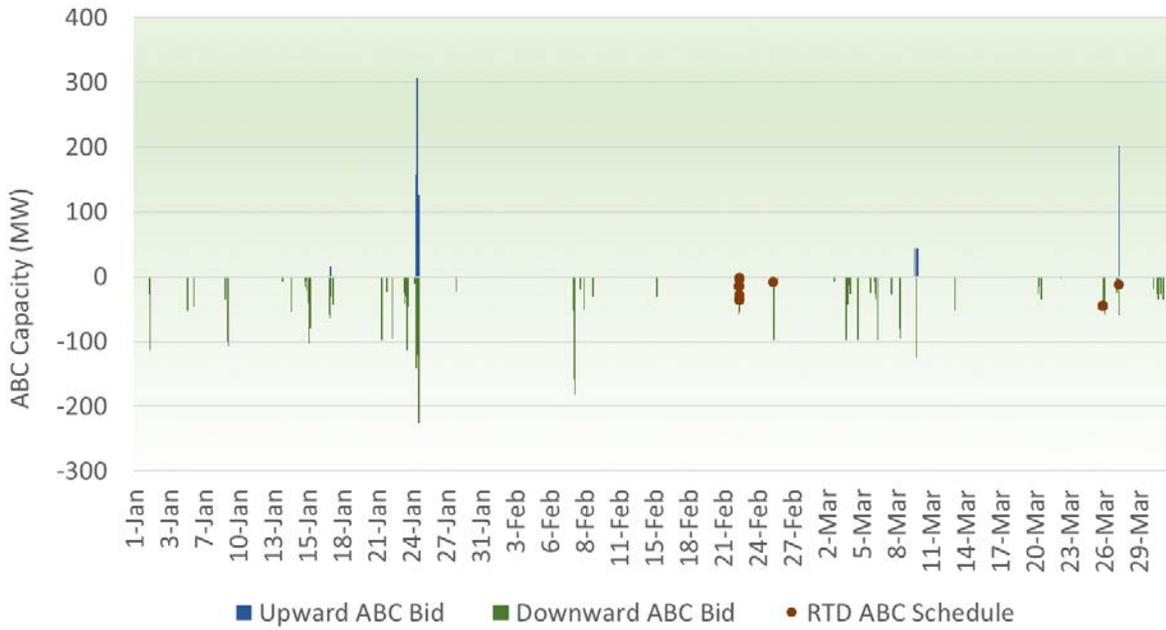
**Figure 6: Submitted and Dispatched ABC in the NV Energy BAA – RTD**



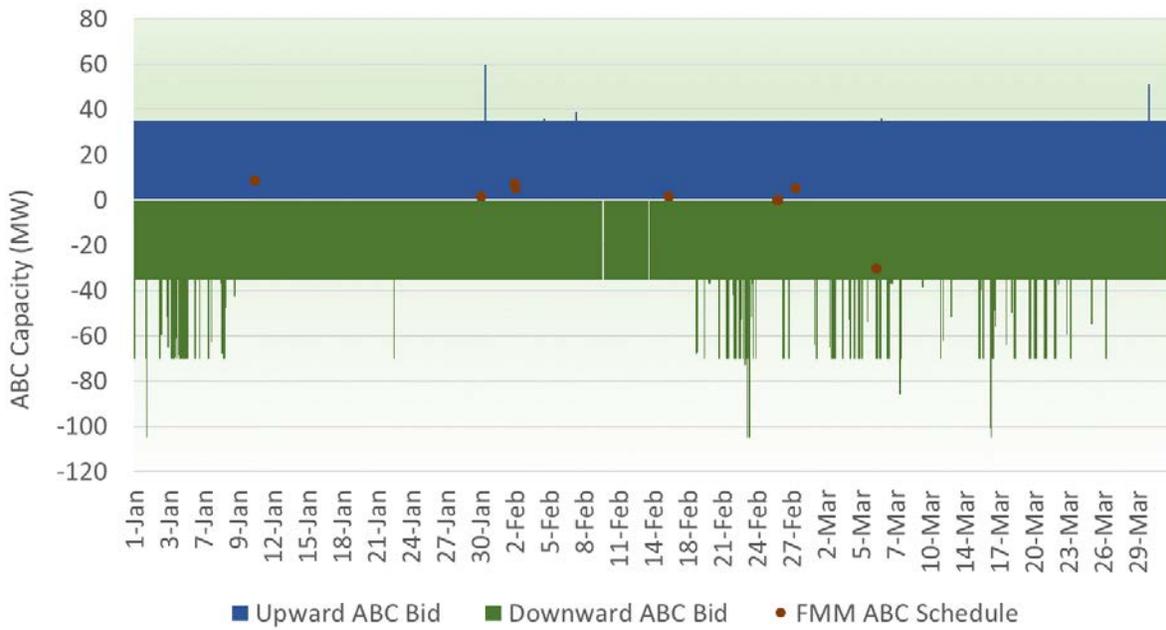
**Figure 7: Submitted and Dispatched ABC in the APS BAA – FMM**



**Figure 8: Submitted and Dispatched ABC in the APS BAA – RTD**



**Figure 9: Submitted and Dispatched ABC in the PSE BAA – FMM**



**Figure 10: Submitted and Dispatched ABC in the PSE BAA – RTD**

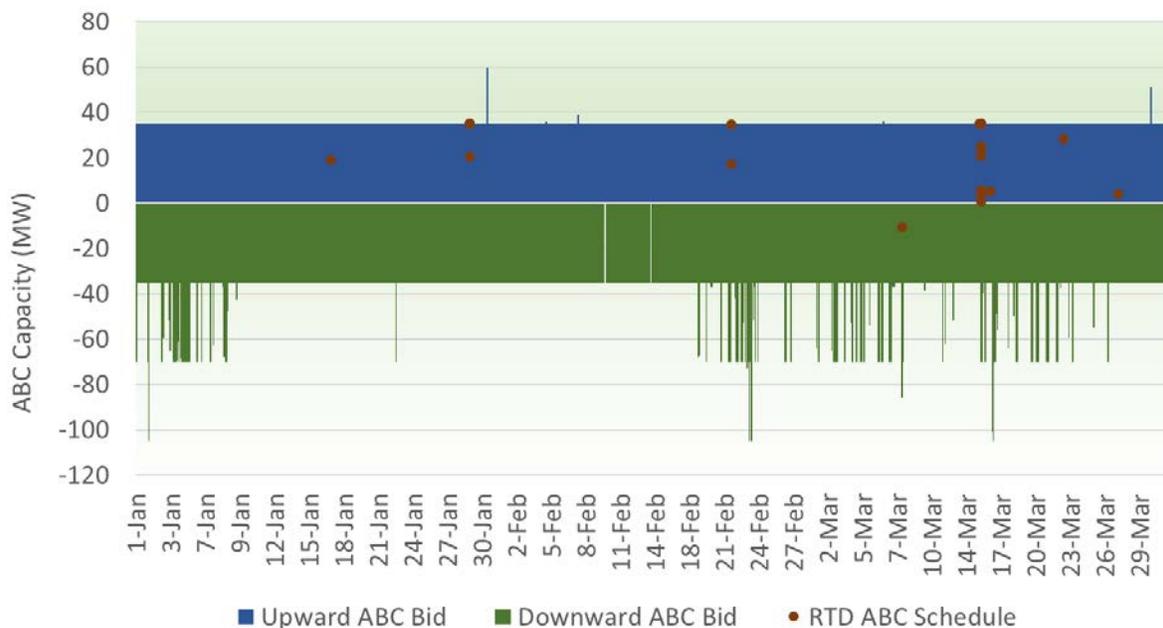


Table 1 summarizes the percentage of intervals in which each EIM entity submitted ABC to the EIM. The NV Energy and PSE BAAs submitted both upward and downward ABC nearly all of the time during the first quarter of 2018 to the EIM, with modest ABC submissions from the PAC East BAA. In contrast, the other EIM entities submitted ABC infrequently to the EIM.

**Table 1: Frequency of ABC Submitted to the EIM**

| Balancing Authority Area | Upward Capacity | Downward Capacity |
|--------------------------|-----------------|-------------------|
| PAC West                 | 0%              | 0.05%             |
| PAC East                 | 10.54%          | 36.61%            |
| NV Energy                | 99.86%          | 99.63%            |
| APS                      | 0.46%           | 4.69%             |
| PSE                      | 99.77%          | 99.08%            |
| PGE                      | 0%              | 0%                |

Table 2 shows the frequency of each EIM entity’s dispatched ABC, when the EIM entities made ABC available, for both the FMM and RTD. Overall, ABC was dispatched very infrequently.

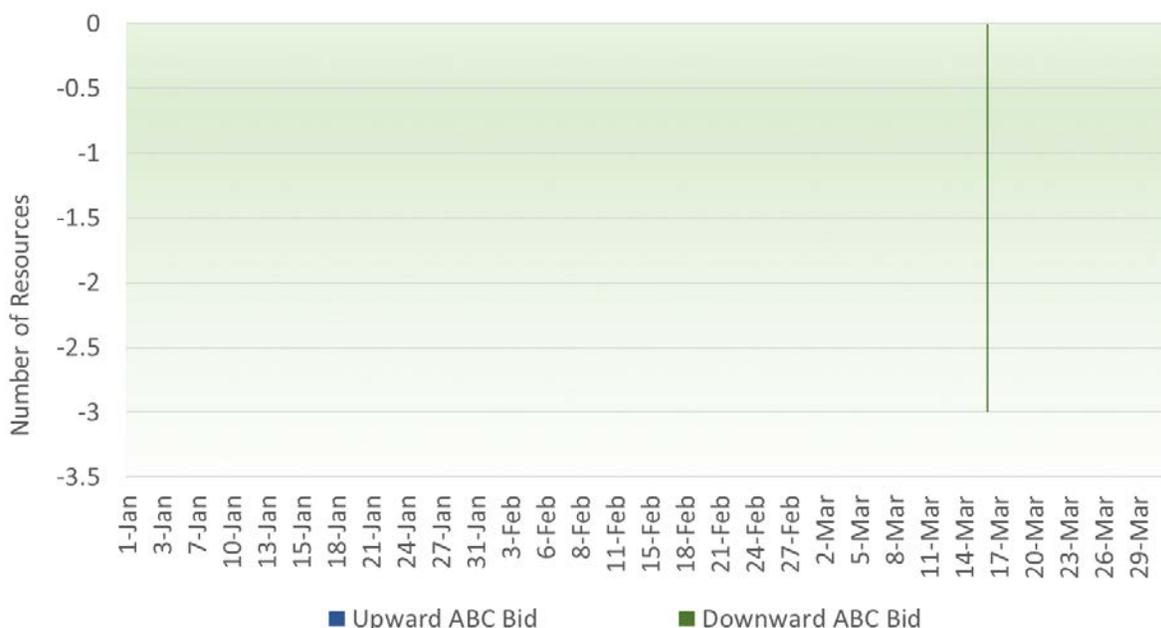
**Table 2: Frequency of EIM Dispatched ABC in the FMM and RTD**

| Balancing Authority Area | Upward Capacity |       | Downward Capacity |        |
|--------------------------|-----------------|-------|-------------------|--------|
|                          | FMM             | RTD   | FMM               | RTD    |
| PAC West                 | 0%              | 0%    | 0%                | 0%     |
| PAC East                 | 0%              | 0.22% | 0%                | 0.01%  |
| NV Energy                | 2.72%           | 2.48% | 0.41%             | 0.79%  |
| APS                      | 0%              | 0%    | 6.19%             | 1.65%  |
| PSE                      | 0.07%           | 0.09% | 0.11%             | 0.004% |
| PGE                      | 0%              | 0%    | 0%                | 0%     |

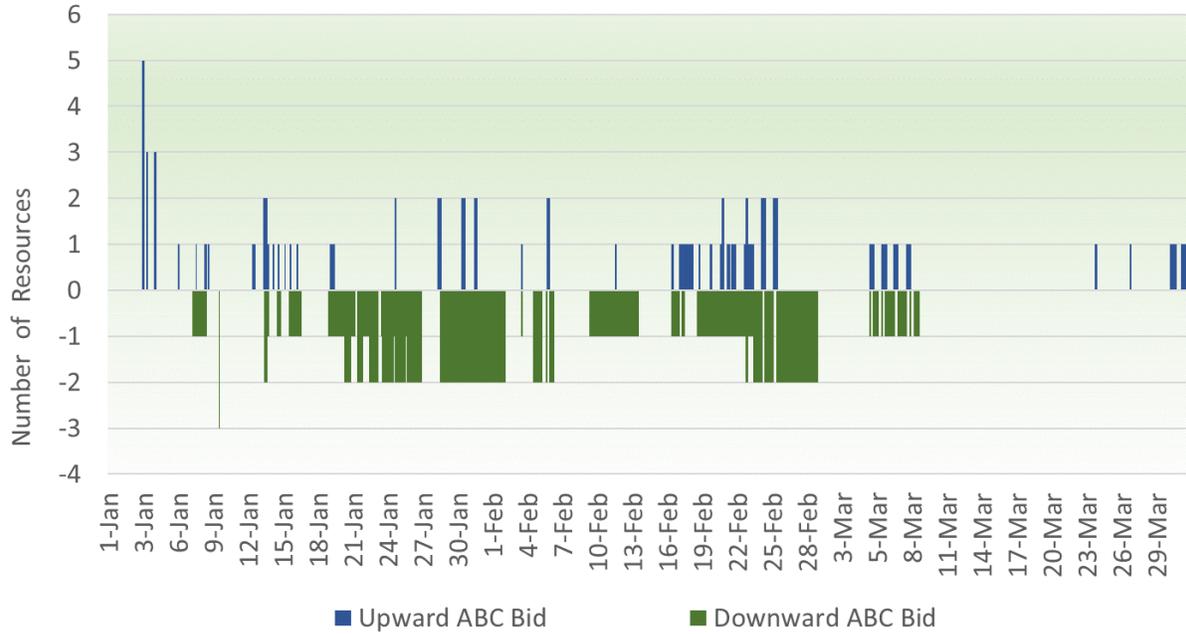
**B. Resources Supporting Available Balancing Capacity**

Figures 11 through 15 show the number of different resources supporting the ABC the EIM entities submitted to the FMM and RTD. The NV Energy and PSE BAAs had a larger pool of resources to support the ABC, while BAAs like PAC West and PGE had few to no resources to support the ABC.

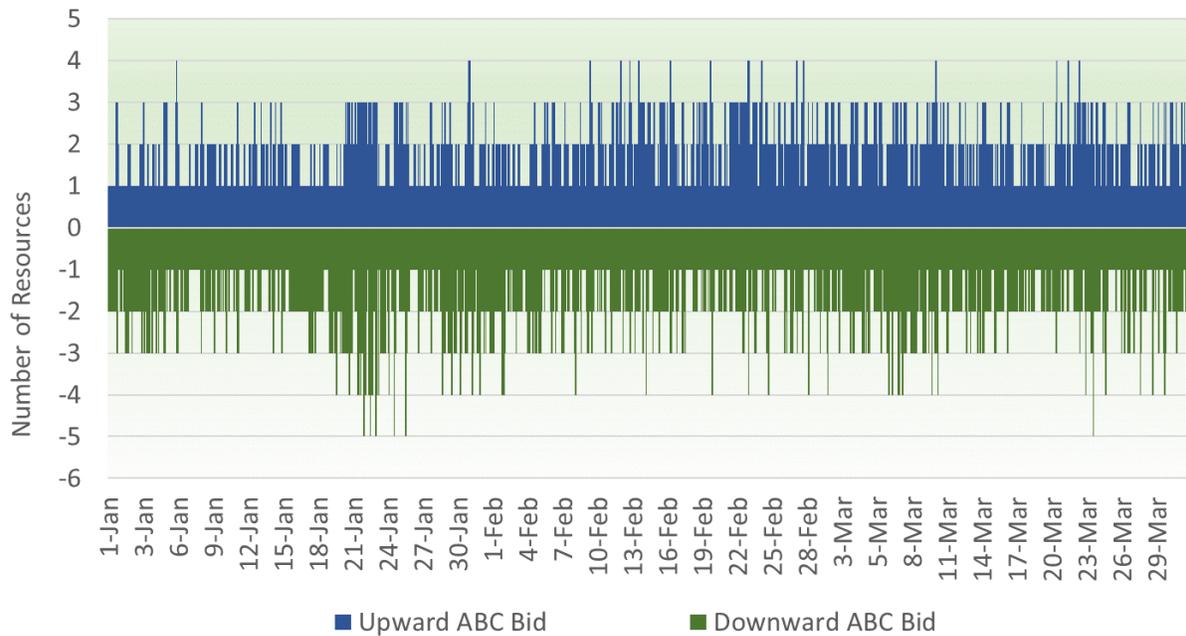
**Figure 11: Number of Resources Supporting the Submitted ABC in the PAC West BAA**



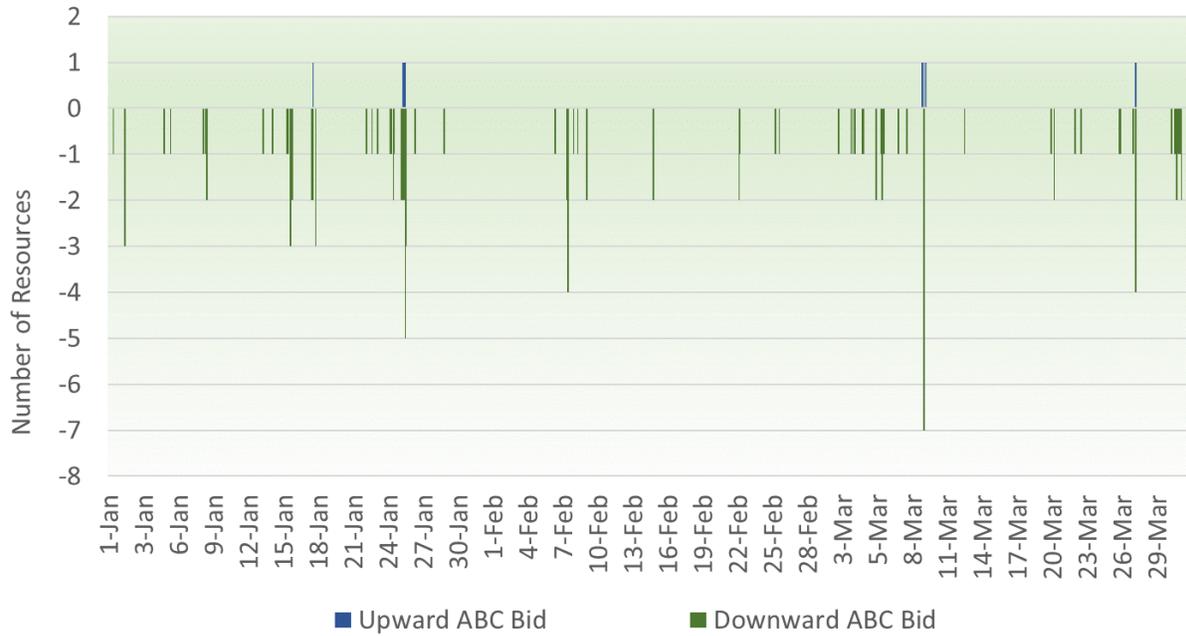
**Figure 12: Number of Resources Supporting the Submitted ABC in the PAC East BAA**



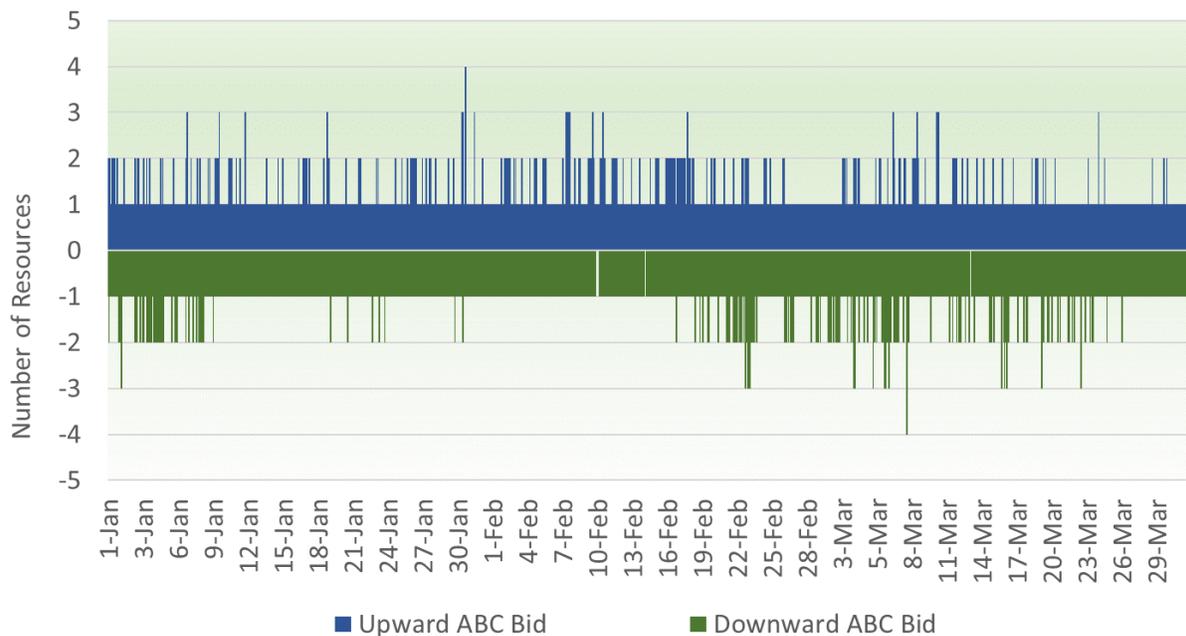
**Figure 13: Number of Resources Supporting the Submitted ABC in the NV Energy BAA**



**Figure 14: Number of Resources Supporting the Submitted ABC in the APS BAA**



**Figure 15: Number of Resources Supporting the Submitted ABC in the PSE BAA**

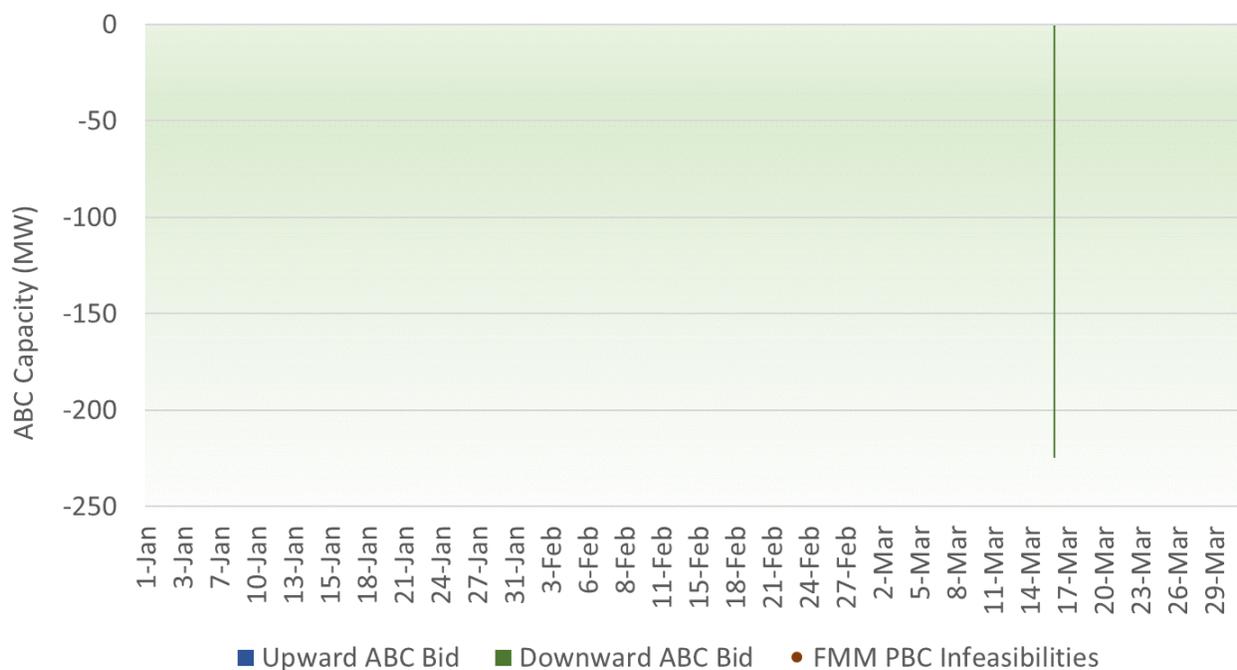


**C. Available Balancing Capacity and Power Balance Constraint Infeasibilities**

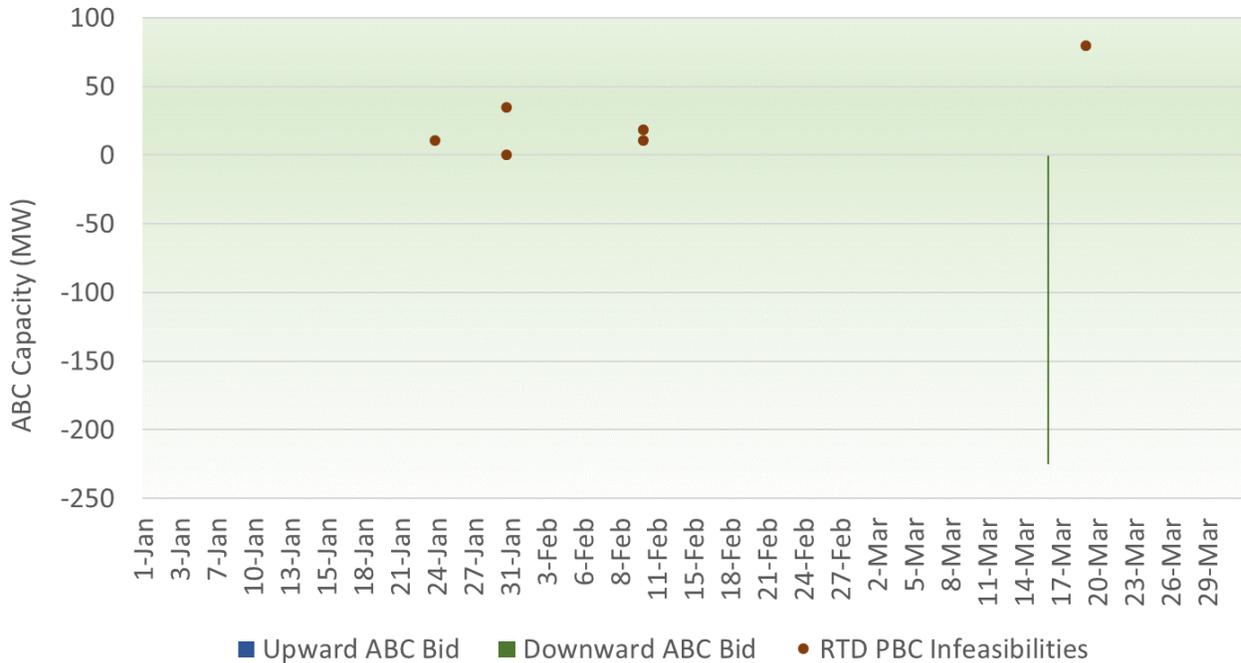
The purpose of the ABC enhancement is to make capacity available that otherwise would not be visible to the EIM. The primary objective in making such capacity available is that the EIM can recognize and access that capacity when the conditions warrant its use, namely when the EIM is running out of capacity made available through economic bids. The ABC is capacity stacked above economic bids, but below the power balance constraint relaxation penalty price. When the market is tight in supply and it has exhausted all effective economic bids, the market clearing process will access the ABC. If there is sufficient ABC, the EIM will relax the power balance constraint to clear the market. As such, the market clearing process uses the ABC to resolve the power balance infeasibility. If instead the ABC identified is not sufficient to cure the infeasibility, the ABC may be exhausted and there may still be the need to relax the power balance constraint in order to clear the EIM.

Figures 16 through 27 show the amount of ABC bids submitted in the FMM and RTD, along with the power balance constraint infeasibilities, separately.

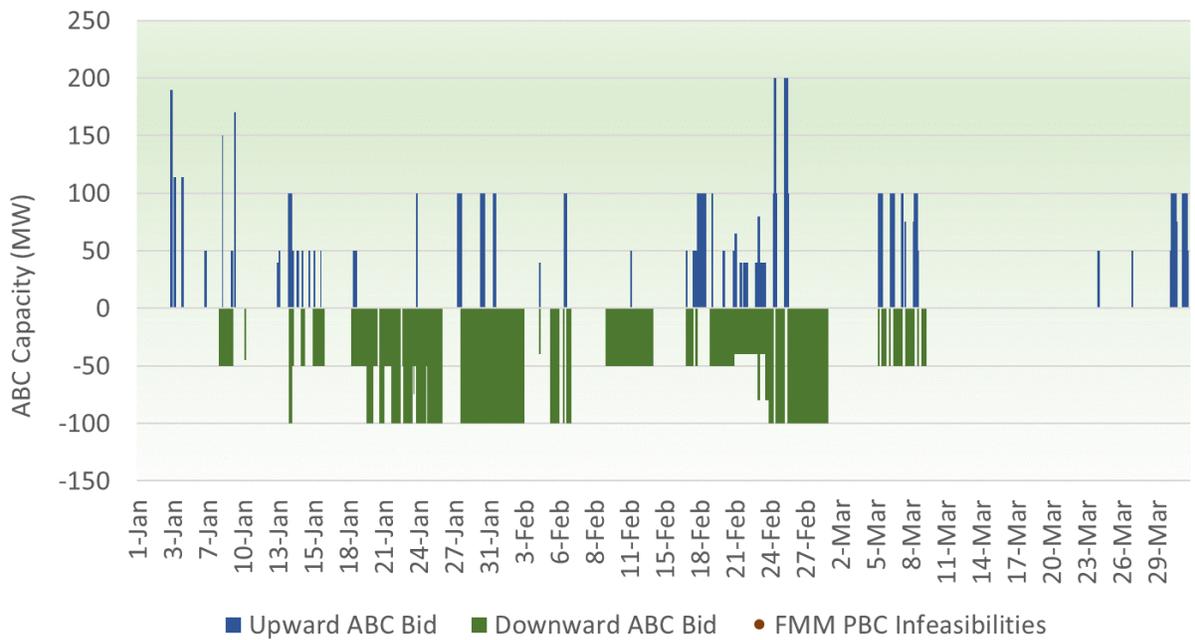
**Figure 16: Submitted ABC and Power Balance Constraint Infeasibilities in the PAC West BAA – FMM**



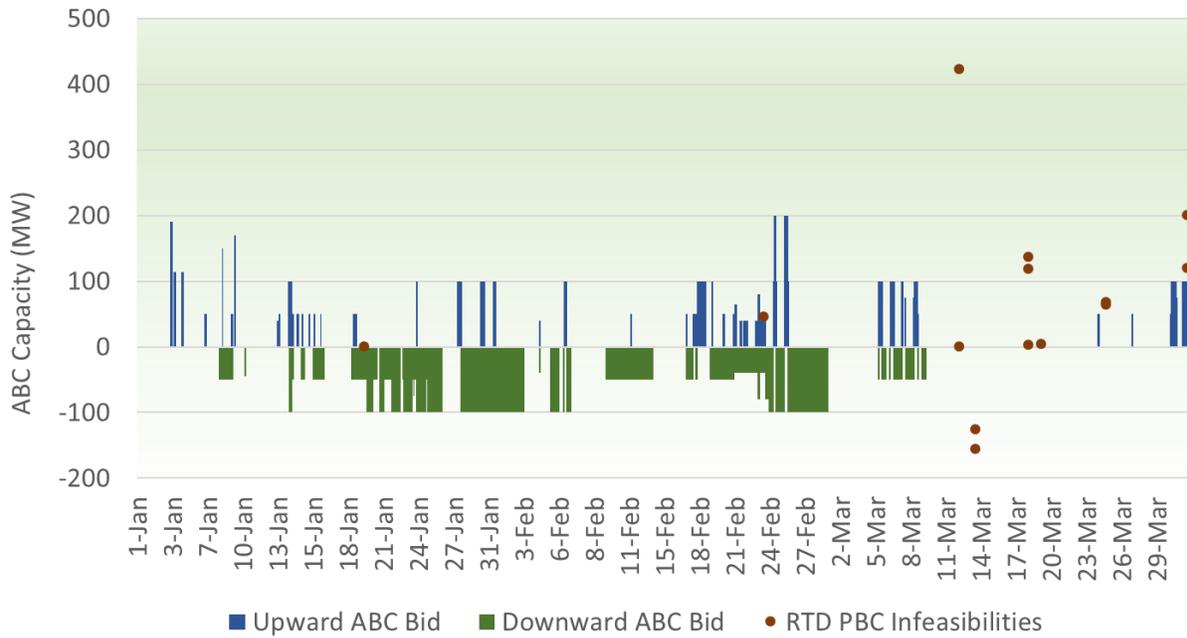
**Figure 17: Submitted ABC and Power Balance Constraint Infeasibilities in the PAC West BAA – RTD**



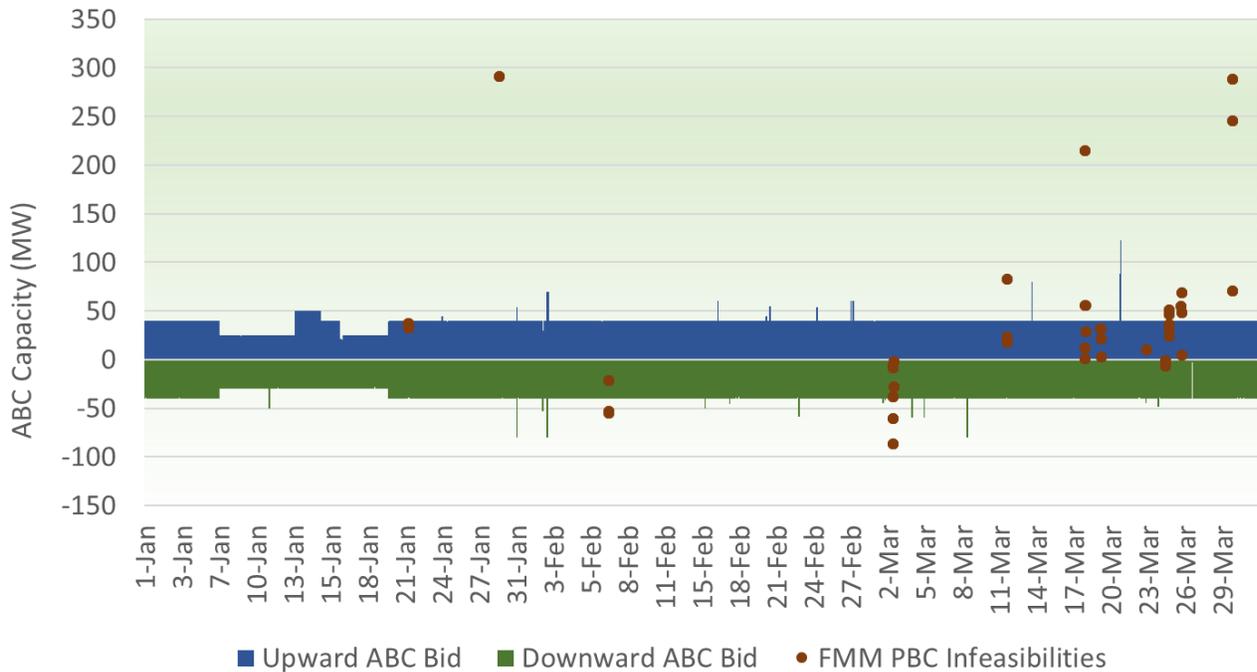
**Figure 18: Submitted ABC and Power Balance Constraint Infeasibilities in the PAC East BAA – FMM**



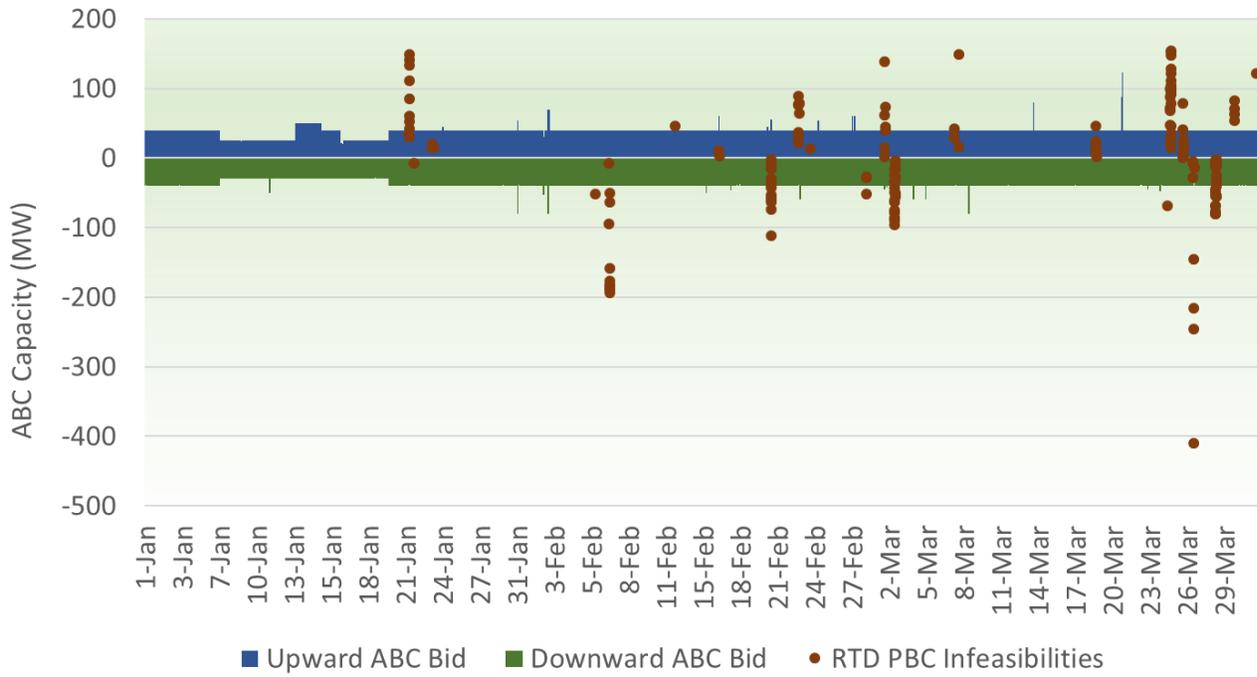
**Figure 19: Submitted ABC and Power Balance Constraint Infeasibilities in the PAC East BAA – RTD**



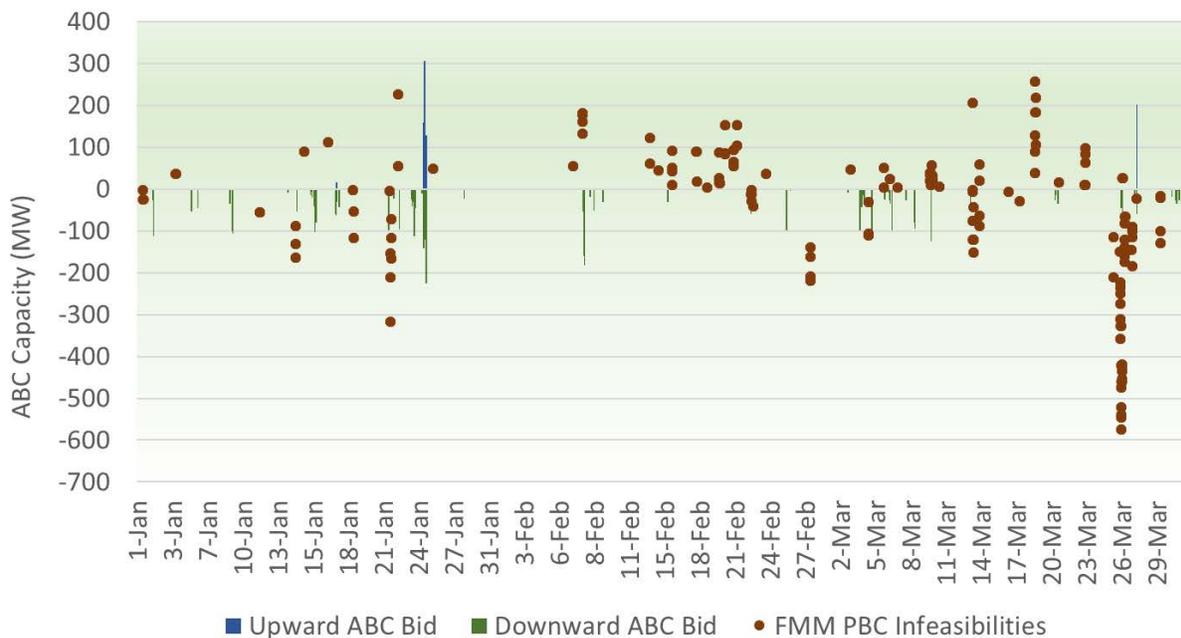
**Figure 20: Submitted ABC and Power Balance Constraint Infeasibilities in the NV Energy BAA – FMM**



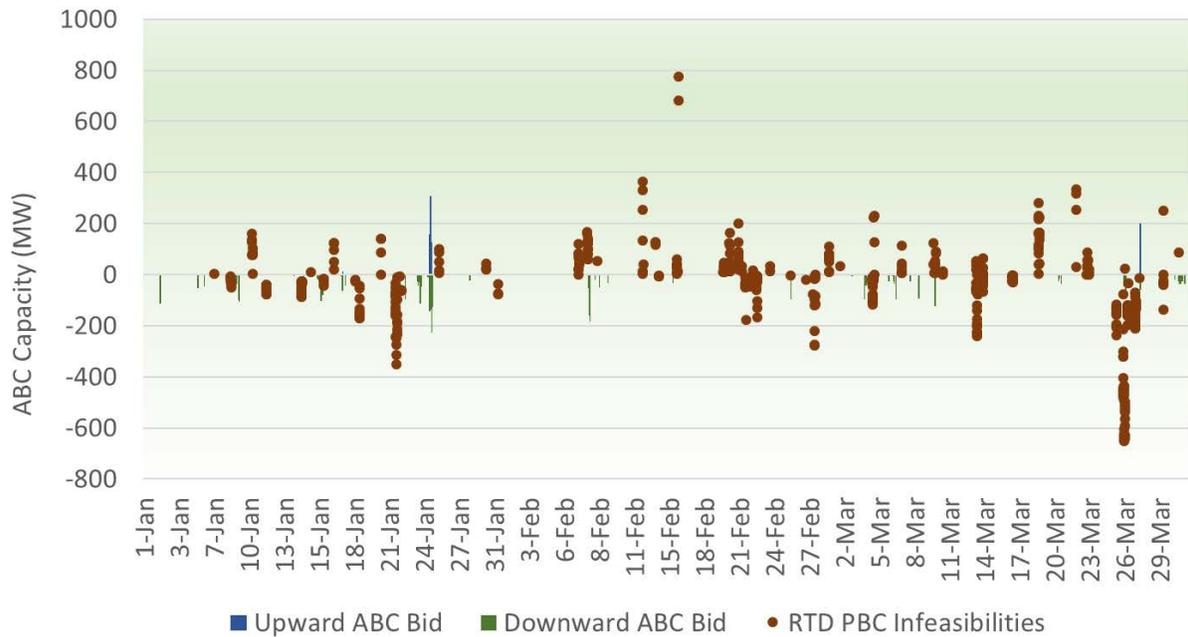
**Figure 21: Submitted ABC and Power Balance Constraint Infeasibilities in the NV Energy BAA – RTD**



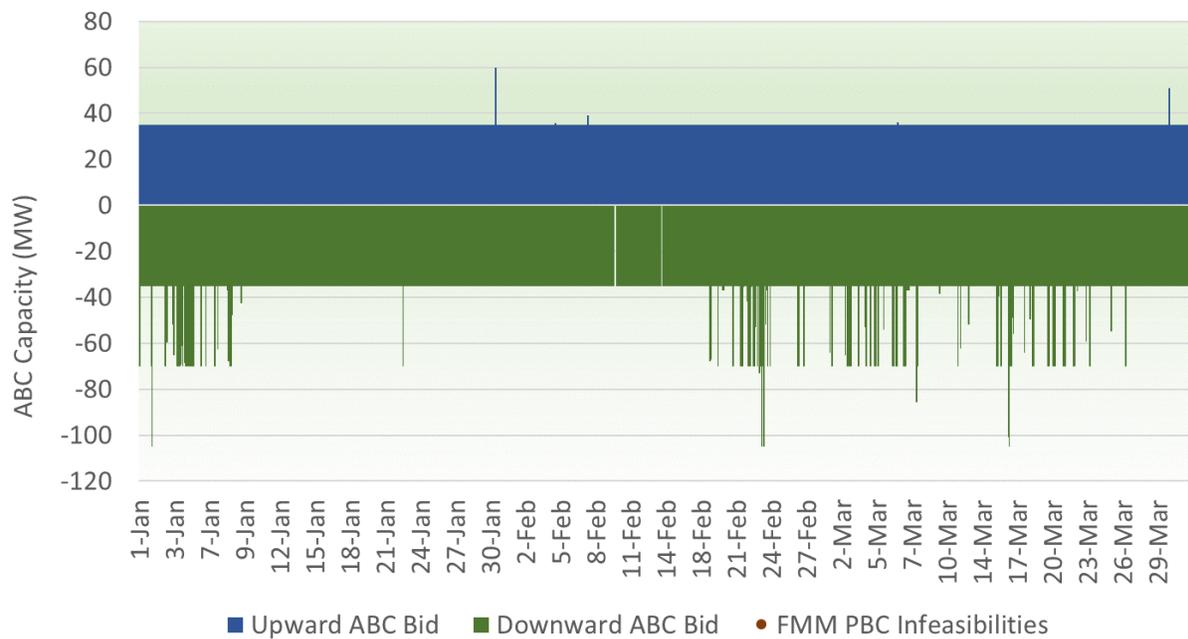
**Figure 22: Submitted ABC and Power Balance Constraint Infeasibilities in the APS BAA – FMM**



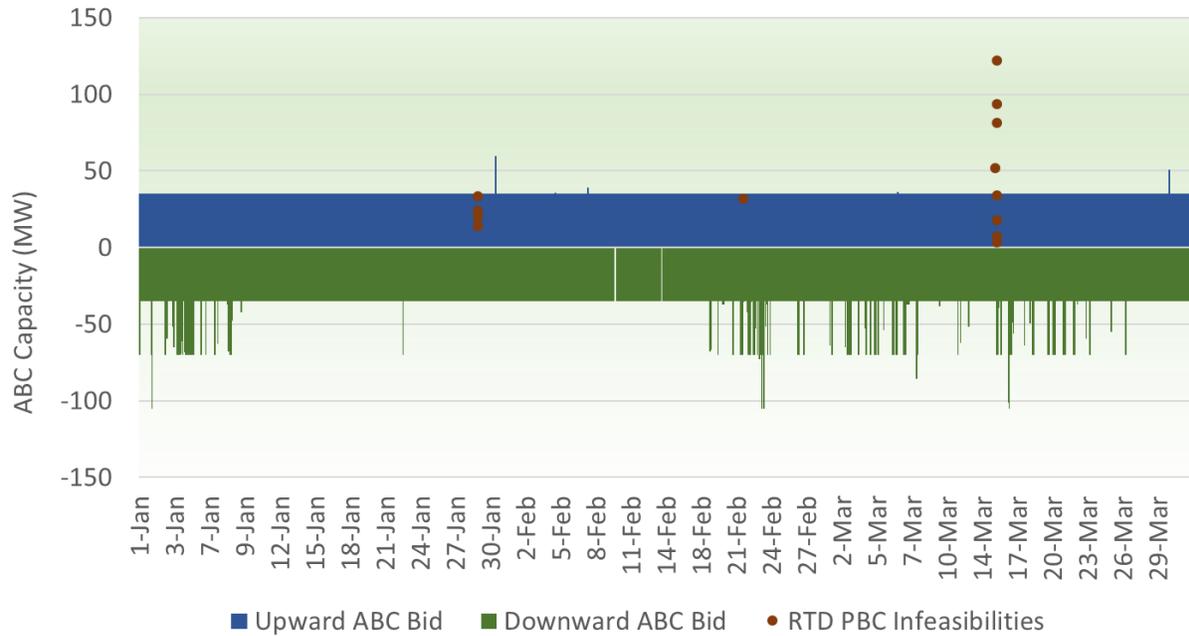
**Figure 23: Submitted ABC and Power Balance Constraint Infeasibilities in the APS BAA – RTD**



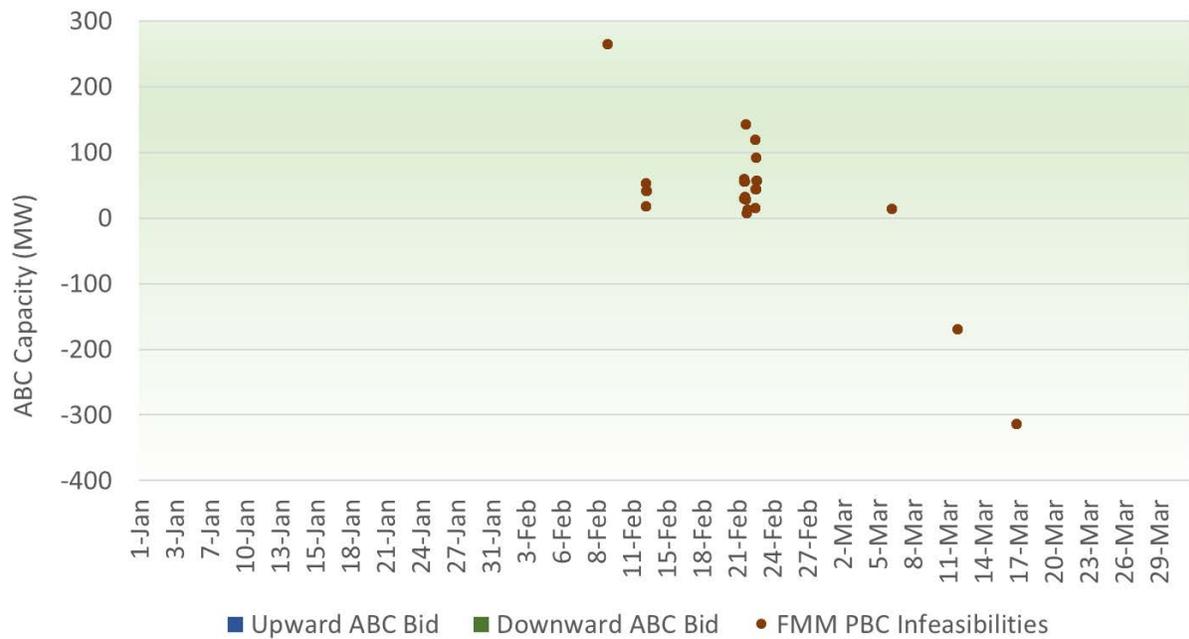
**Figure 24: Submitted ABC and Power Balance Constraint Infeasibilities in the PSE BAA – FMM**



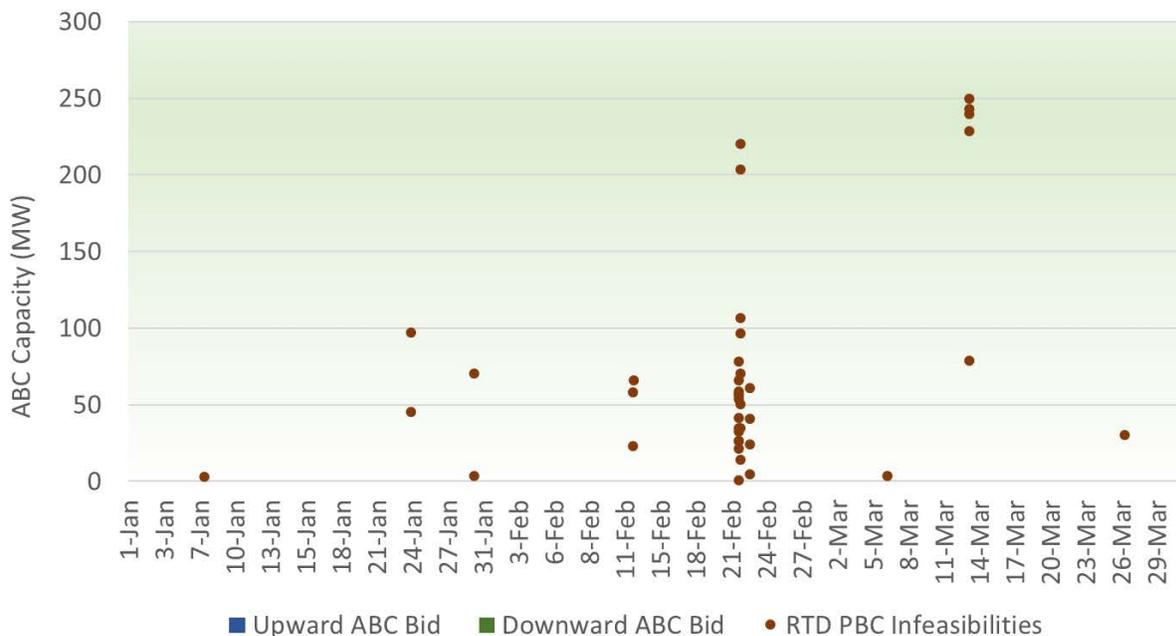
**Figure 25: Submitted ABC and Power Balance Constraint Infeasibilities in the PSE BAA – RTD**



**Figure 26: Submitted ABC and Power Balance Constraint Infeasibilities in the PGE BAA – FMM**



**Figure 27: Submitted ABC and Power Balance Constraint Infeasibilities in the PGE BAA – RTD**



Based on the data provided in the Figures 16 through 27 above, Table 3 shows the frequency of intervals in which the EIM entities did not make any ABC available to the EIM, which caused the power balance constraint to relax. Specifically, the data in Table 3 provides the percentage amount of over-supply infeasibilities where downward ABC was needed, and under-supply infeasibilities where upward ABC was needed. For instance, for the PGE BAA, the metric for undersupply in the FMM was 100 percent, indicating that in all intervals when an infeasibility was observed in the FMM, the EIM entities did not submit any ABC to the EIM.

**Table 3: Frequency of Power Balance Infeasibilities When no ABC was Available in the Market**

| BAA       | Over-supply |        | Under-supply |        |
|-----------|-------------|--------|--------------|--------|
|           | FMM         | RTD    | FMM          | RTD    |
| PAC West  | -           | 100%   | 100%         | 100%   |
| PAC East  | 0%          | 100%   | 0%           | 75%    |
| NV Energy | 0%          | 0%     | 0%           | 0%     |
| APS       | 77.22%      | 82.69% | 100%         | 97.54% |
| PSE       | 0%          | 0%     | 0%           | 0%     |
| PGE       | 100%        | 100%   | 100%         | 100%   |

Through its evaluation of the ABC performance, the CAISO has observed two additional scenarios that can occur in the EIM:

1. Use of ABC related to resource constraints: The CAISO market optimization software recognizes the resource constraints and characteristics of capacity identified as ABC, just as it does of any other participating capacity in the market. Therefore, at times the market is constrained from utilizing the identified capacity due to the operational characteristics of the resources identified as such. The CAISO has observed that in several instances when there power balance constraint was relaxed, the ABC identified by the EIM entity was not sufficient to resolve the power balance infeasibility because of the operational ramp limitations of the resources. In some cases, the resources ramp rate may be very limited because of the resource's operating point at any given point in time. In other cases, the resource is not available because in that particular interval the resource must cross a forbidden region first in order to access the ABC and that may take several market intervals, thereby preventing the market optimization software from utilizing the identified capacity. In some instances, a resource is required to cross the operational range where the ABC is defined, and given its ramp rate, the only way for the resource to reach an expected operating point is by dispatching it within the operating region with ABC.
2. Use of ABC related to congestion management: The CAISO market systems release the ABC in the scheduling run based on the scheduling run's assessment of system conditions. However, the CAISO schedules and prices resources in the CAISO markets. The ABC is considered as part of the market clearing process in the pricing run. The pricing run will optimize the entire EIM BAA, which is the combination of all BAAs that participate in the EIM, including the CAISO's BAA. The market software will simultaneously consider the ABC in clearing the least-cost congestion management solution based on resource constraints and system conditions it observes. Consequently, in some instances the market clearing process released the ABC in the EIM BAA it was necessary to release the capacity to address congestion in either the EIM or elsewhere in the system. The ABC is considered as part of the single market optimization for the entire EIM BAA, the need to re-dispatch resources to manage congestion efficiently would have resulted in the re-allocation of resources such that the ABC would need to be released to ensure the EIM are could operate its system reliably.

However, because the CAISO aims to ensure the EIM BAA can operate its system reliably with the use of the ABC it identifies, the CAISO enforces a constraint that ensures that when the market clearing process clears ABC, it stays within the EIM entity BAA. While the CAISO is not able to isolate the electrons, the constraint ensures that EIM does not export the ABC to another BAA to the detriment of the specific EIM BAA by ensuring that the exports from the EIM BAA are net of the ABC released in an EIM entity BAA.

#### IV. EIM Performance

This section provides the information the CAISO previously provided in its monthly informational reports submitted during an EIM entity's first six-month transition period. In this report, the CAISO only provides information on the performance for the PAC West, PACE East, NV Energy, APS, and PSE BAAs because those EIM balancing authority areas were no longer in a transition period. The CAISO has submitted reports related to the performance for the PGE BAAs in its respective monthly EIM transition period reports corresponding to the months covered by this quarterly report.<sup>5</sup>

##### A. Prices

Figures 28 through 32 show the EIM load aggregation point (ELAP) prices<sup>6</sup> for the FMM and RTD in each EIM entity's BAA. These trends show only the factual prices, which are financially binding. In prior reports, the CAISO provided these factual prices in comparison to counterfactual prices in order to show the effect of using the pricing waiver of the price discovery mechanism.

This comparison remains meaningful because the transitional period provisions are applicable to the PGE BAA during the first quarter of 2018.<sup>7</sup>

The CAISO may correct prices posted on its Open Access Same-time Information System (OASIS) pursuant to the CAISO's price correction authority in section 35 of the CAISO tariff, if it finds: (1) that the prices were the product of an invalid market solution; or (2) the market solution produced an invalid price due to data input failures, hardware or software failures; or (3) a result that is inconsistent with the CAISO Tariff. The prices presented in Figures 28 through 32 include all prices produced by the CAISO consistent with the CAISO tariff requirements. That is, the trends below represent: (1) prices as produced in the market for which the CAISO deemed valid; (2) prices that the CAISO could and did correct pursuant to section 35 of the CAISO tariff; and (3) any prices the CAISO adjusted pursuant to transition period pricing reflected in section 29.27 of the CAISO tariff.

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<sup>5</sup> The monthly EIM transition period reports for the PGE BAA were filed with the Commission in Docket No. ER15-2565.

<sup>6</sup> The ELAP provides aggregate prices that are representative of pricing in the overall area of NV Energy.

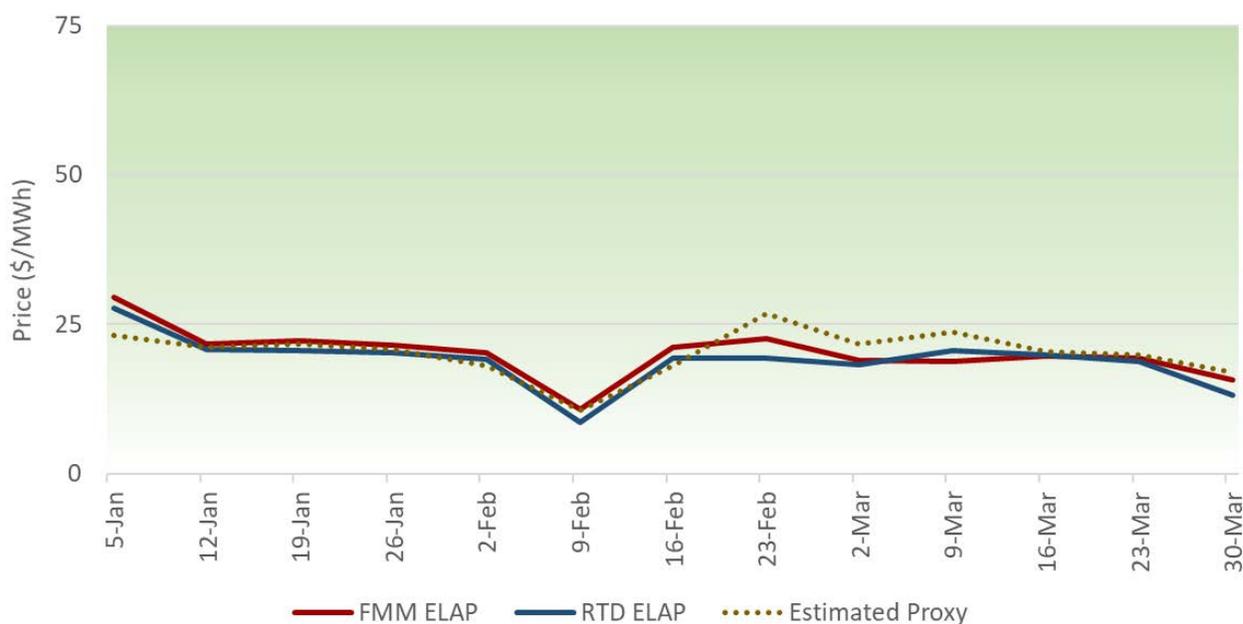
<sup>7</sup> In Docket ER15-402, the CAISO reported on prices based on the price discovery mechanism in effect during the term of the Commission's waiver granted in that docket and the prices as they would be if the waiver was not in effect, *i.e.*, what prices would have been had they been on the penalty prices in the CAISO tariff. Because pricing under the waiver pricing is based on the last economic bid price signal, these prices are a proxy of what the prices would have been absent the seven category of learning curve type issues experience in that market. The difference between the counterfactual pricing and the price in effect during the term of the reports in that docket illustrated the market impact of the waiver pricing.

Table 4 shows the average ELAP prices for all EIM entity BAAs observed in the period of January 1 to March 31, 2018. FMM and RTD ELAP prices are represented with red and blue lines respectively, while estimated proxy ELAP prices are represented with a dotted line.

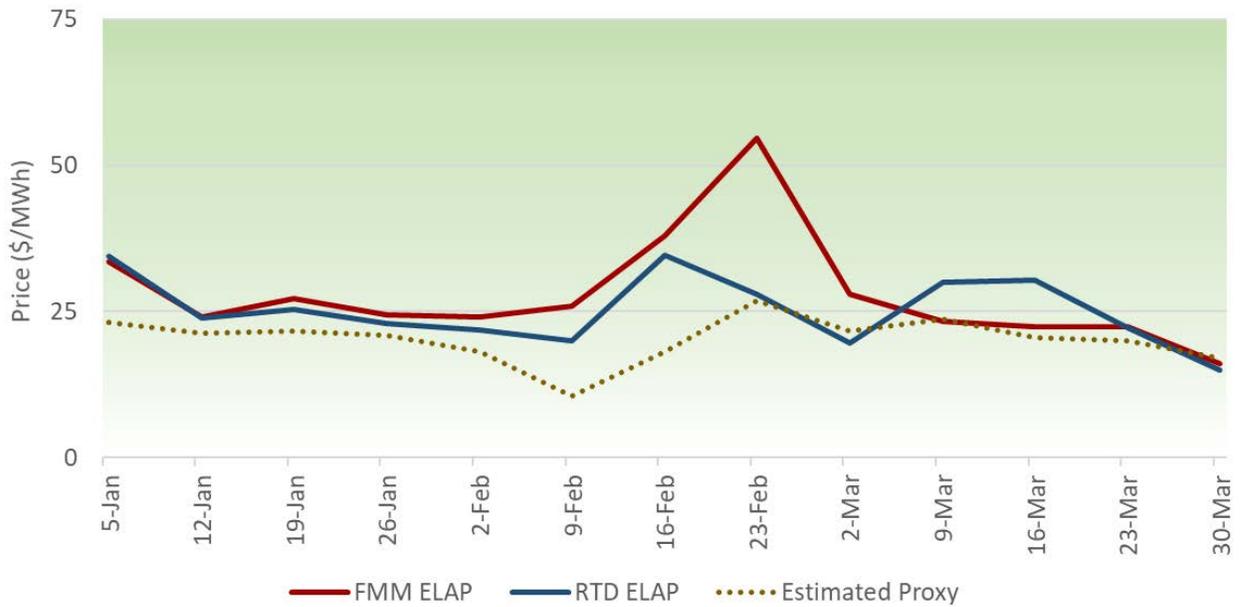
**Table 4: Average ELAP Prices for the Various EIM BAAs**

| BAA       | FMM         | RTD         |
|-----------|-------------|-------------|
| PAC West  | \$20.05/MWh | \$18.82/MWh |
| PAC East  | \$27.93/MWh | \$25.33/MWh |
| NV Energy | \$32.56/MWh | \$30.38/MWh |
| APS       | \$31.08/MWh | \$29.34/MWh |
| PSE       | \$19.92/MWh | \$18.86/MWh |

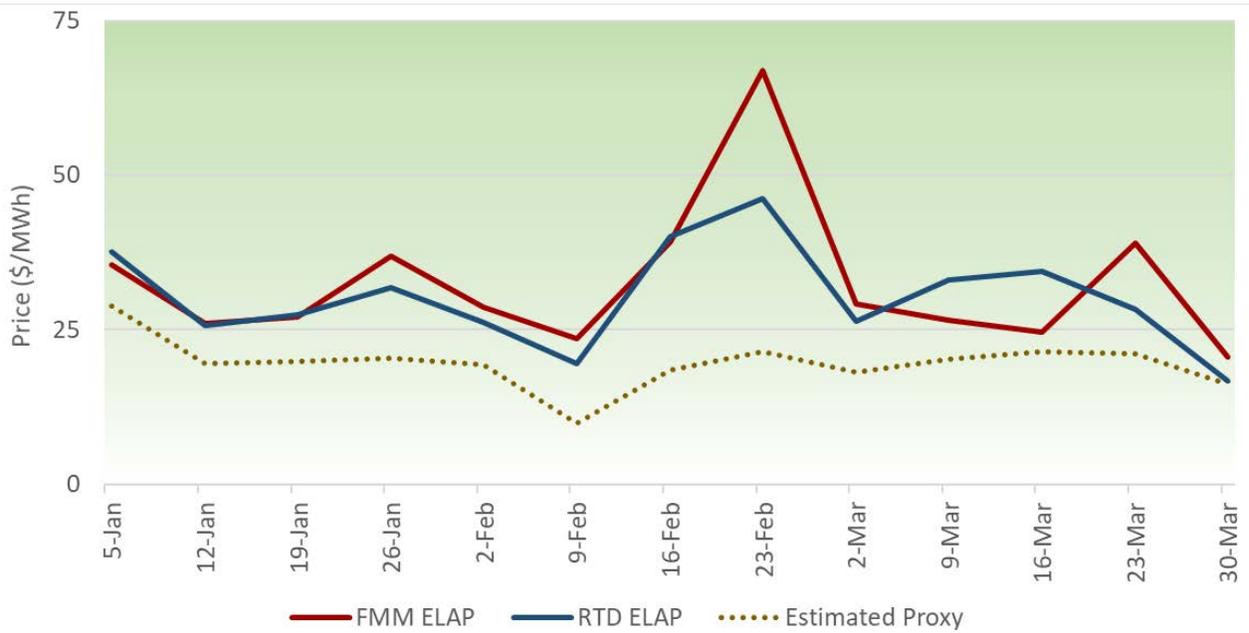
**Figure 28: Daily Average Price for the PAC West BAA ELAP**



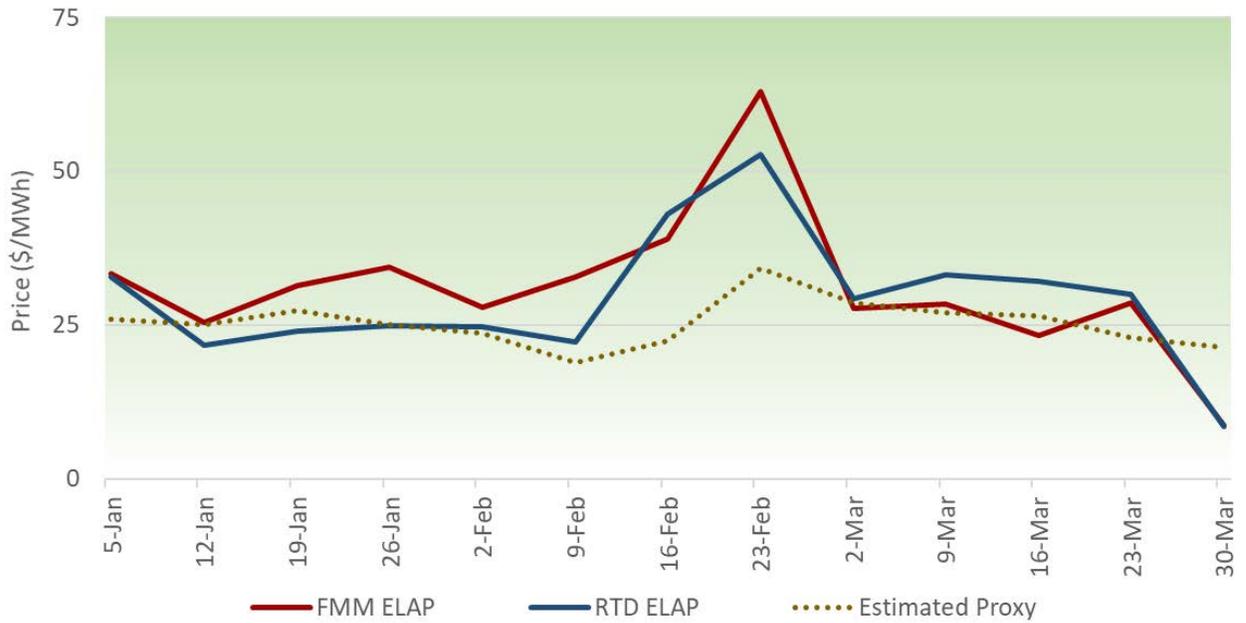
**Figure 29: Daily Average Price for the PAC East BAA ELAP**



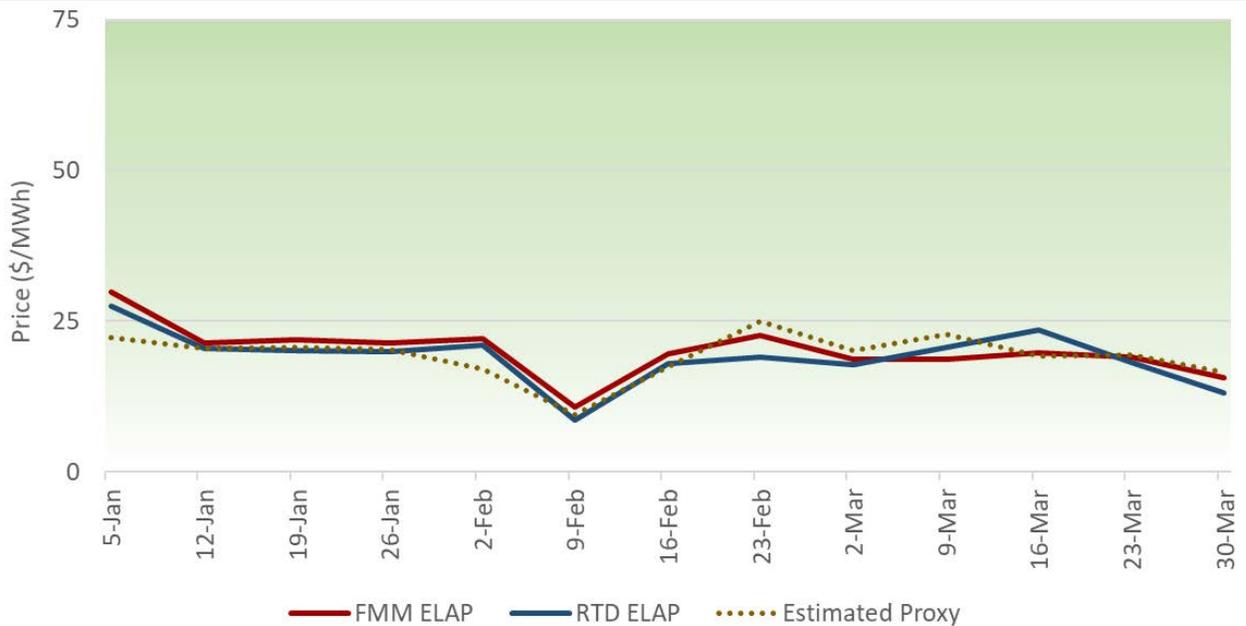
**Figure 30: Daily Average Price for the NV Energy BAA ELAP**



**Figure 31: Daily Average Price for the APS BAA ELAP**



**Figure 32: Daily Average Price for the PSE BAA ELAP**



## B. Frequency of Power Balance Constraint Relaxation

Figures 33 through 40 show the frequency of intervals in which the power balance constraint was relaxed in each EIM entity's BAA for under-supply or over-supply conditions in the FMM and RTD, respectively. A bar with positive frequency represents an under-supply power balance constraint infeasibility, and a bar with negative frequency represents an over-supply power balance constraint infeasibility. The CAISO excluded invalid infeasibilities and therefore these frequencies reflect only actual infeasibilities. Invalid infeasibilities are power balance constraint infeasibilities for intervals that were subject to a price correction under the provisions of the CAISO tariff.

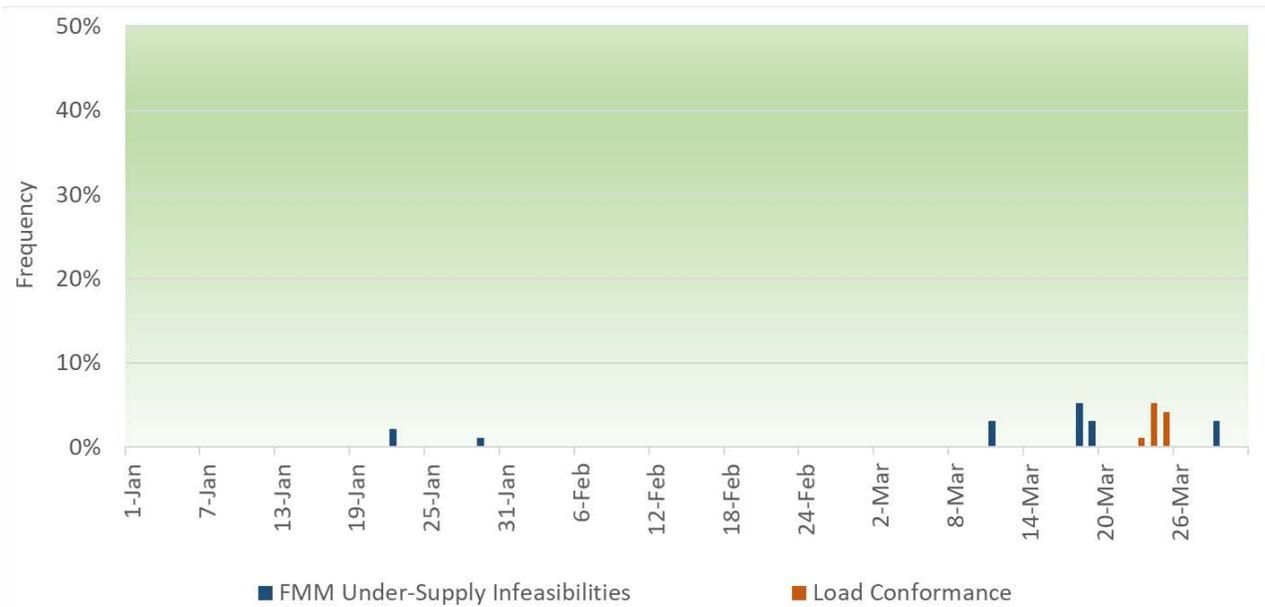
The CAISO uses a load conformance limiter in the CAISO BAA and the EIM entity's BAA to prevent over-adjustments through use of load conformance, and thus prevent an artificial infeasibility – that is, one that does not reflect actual scarcity. When the quantity of the infeasibility is less than the system operator's adjustment, and the infeasibility is in the same direction as the adjustment, the load conformance limiter automatically limits the system operator's adjustments to at least the feasibility level. In the pricing run, the limiter will remove an infeasibility that is less than or equal to the system operator's adjustment, *i.e.*, the load conformance. The limiter will not apply to infeasibilities greater than or in the opposite direction of the load conformance. Use of the load conformance limiter avoids invalid constraints that arise through operations rather than because of real supply issues.<sup>8</sup> This feature applies to either over- or under-supply infeasibilities.

There were 81 valid under-supply infeasibilities (0.9 percent of the time) in the FMM in the NV Energy BAA during the reported three-month period; the load conformance limiter covered approximately 37 percent of these instances. For the RTD, there were 90 under-supply infeasibilities (0.4 percent of the time); the load conformance limiter covered approximately 84 percent of these instances.

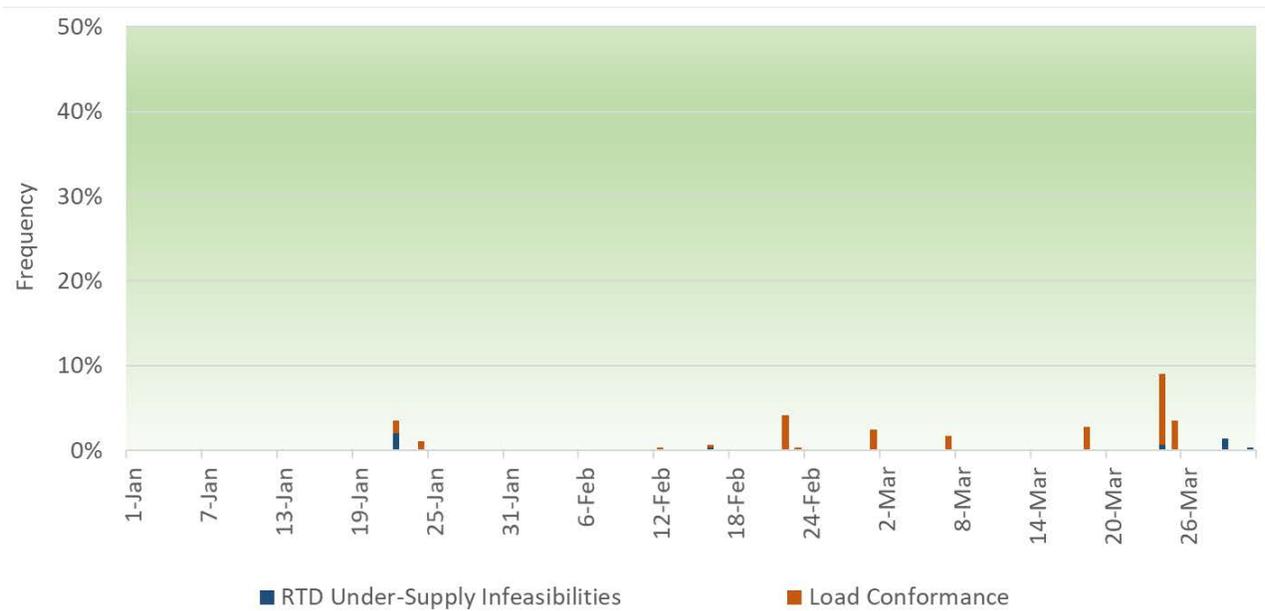
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<sup>8</sup> The CAISO amended its tariff to include enhancements to the limiter later in 2018, which were approved and became effective in February 2019: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ImbalanceConformanceEnhancements.aspx>.

**Figure 33: Frequency of FMM Power Balance Infeasibilities in the NV Energy BAA**



**Figure 34: Frequency of RTD Power Balance infeasibilities in the NV Energy BAA**



For the PAC West BAA, there were no valid undersupply in the FMM during the reported three-month period. For the RTD, there were 6 under-supply infeasibilities (0.025 percent of the time); the load conformance limiter covered approximately 17 percent of these instances.

**Figure 35: Frequency of FMM Power Balance Infeasibilities in the PAC West BAA**



**Figure 36: Frequency of RTD Power Balance in Feasibilities in the PAC West BAA**



There were no undersupply infeasibilities in the FMM in the PAC East BAA

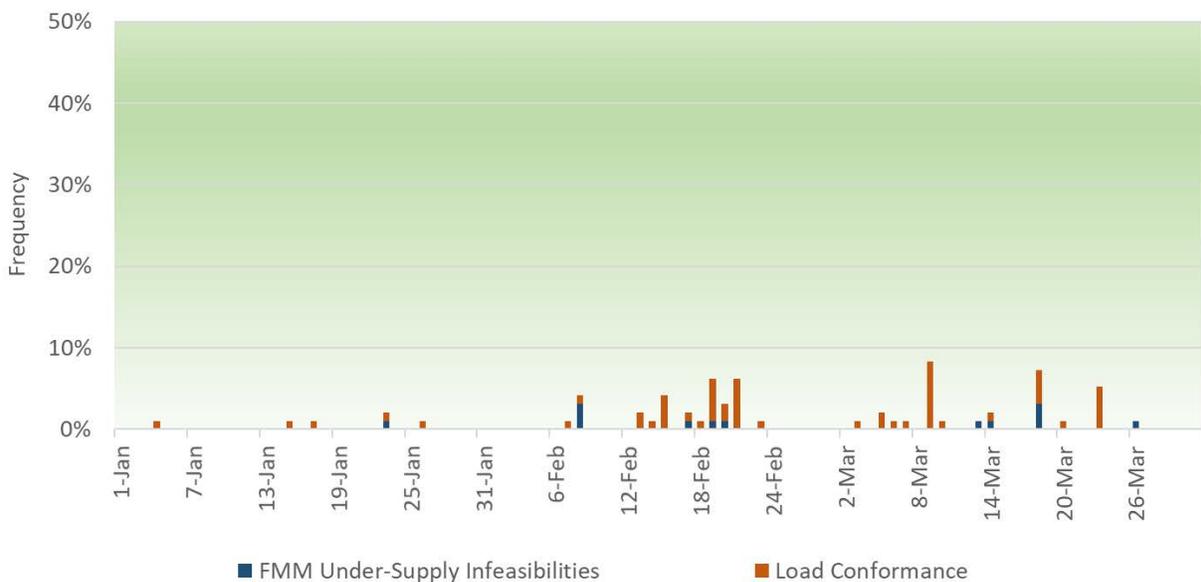
during the reported three-month period. For the RTD, there were 12 under-supply infeasibilities (0.05 percent of the time). The load conformance limiter covered approximately 58 percent of these instances.

**Figure 37: Frequency of RTD Power Balance Infeasibilities in PAC East BAA**



There were 204 valid undersupply infeasibilities (2.4 percent of the time) in the FMM in the APS BAA during the reported period; the load conformance limiter covered 81 percent of these instances. For the RTD, there were 203 under-supply infeasibilities (0.8 percent of the time); the load conformance limiter covered approximately 80 percent of these instances.

**Figure 38: Frequency of FMM Power Balance Infeasibilities in the APS BAA**

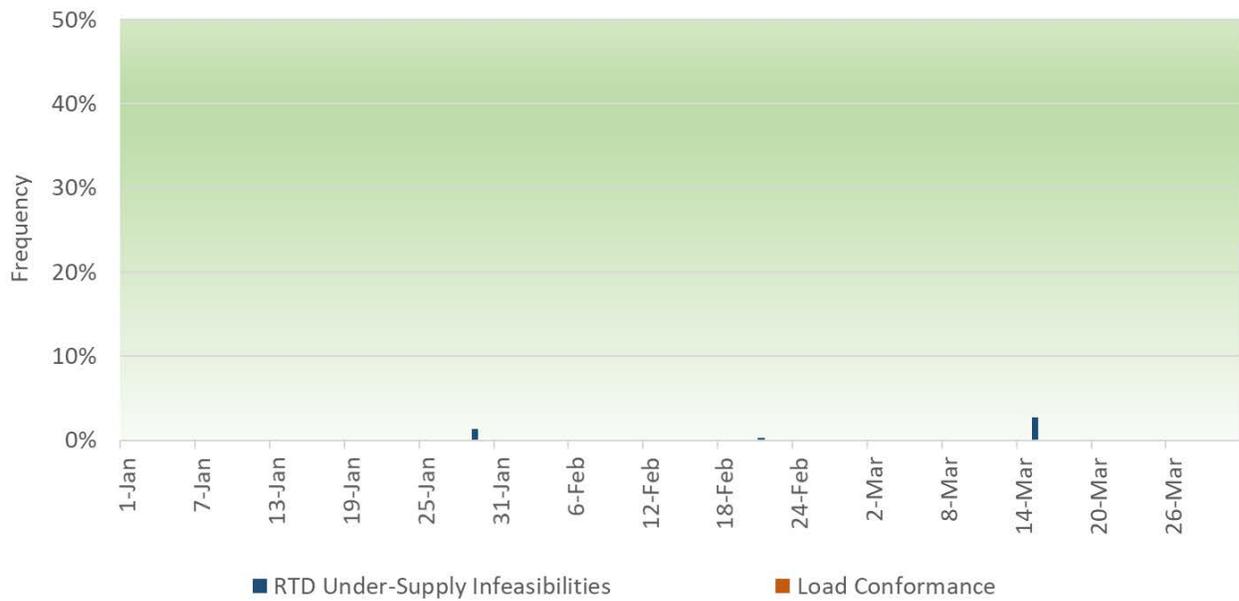


**Figure 39: Frequency of RTD Power Balance Infeasibilities in the APS BAA**



There were no undersupply infeasibilities in the FMM in the PSE BAA during the reported three-month period, and thus no data is presented graphically below. For the RTD, there were 13 under-supply infeasibilities (0.05 percent of the time) with no instances of load conformance.

**Figure 40: Frequency of RTD Power Balance Infeasibilities in the PSE BAA**

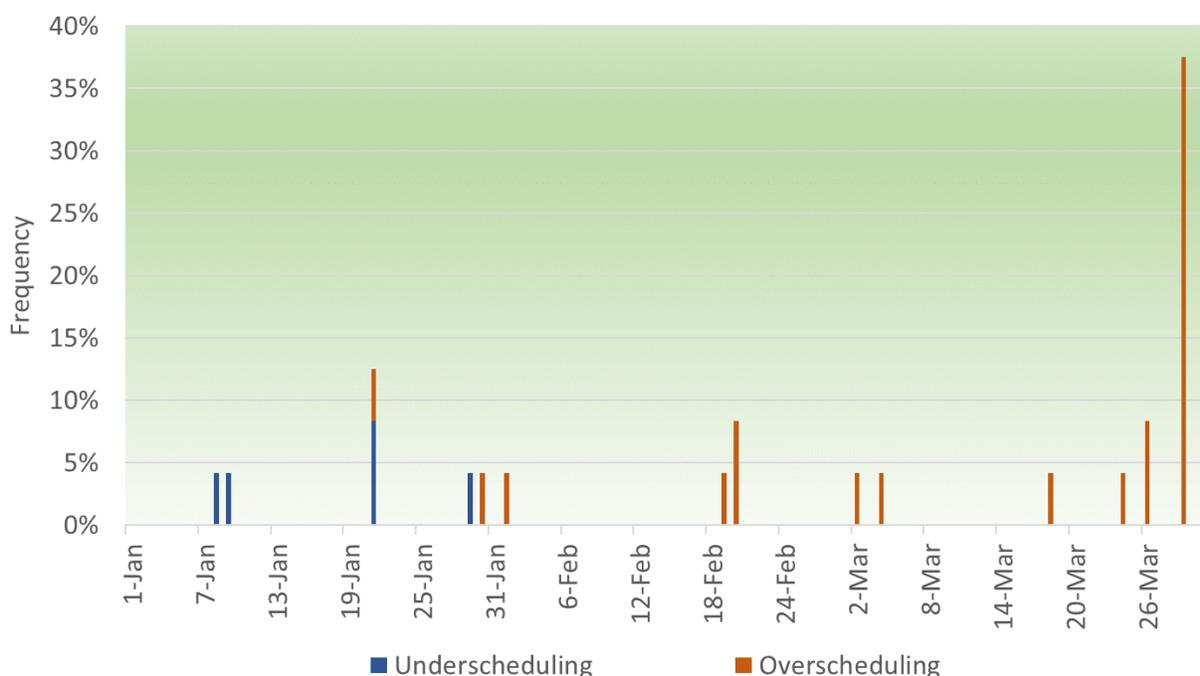


### C. Balancing and Sufficiency Test Failures

Figures 41 through 45 show the trend of balancing test failures for the period of January 1 through March 31, 2018 for each EIM entity's BAA. The CAISO performs the balancing test pursuant to section 29.34(k) of the CAISO tariff.

The NV Energy BAA passed the balancing test 98.7 percent of the time, where approximately 27 percent of the failures were due to under-scheduling. These failures are within normal ranges and reflect the incidence of the forecasting and balancing process that has occurred at a frequency that is well within expected performance tolerances.

**Figure 41: Frequency of Balancing Test Failures for the NV Energy BAA**



The PAC West BAA passed the balancing test for the reported period approximately 99 percent of the time, where approximately 40 percent of the failures reflected under-scheduling. Similarly, the PAC East BAA passed the balancing test approximately 99 percent of the time, and approximately 30 percent of the failures were associated with under-scheduling.

**Figure 42: Frequency of Balancing Test Failures for the PAC West BAA**

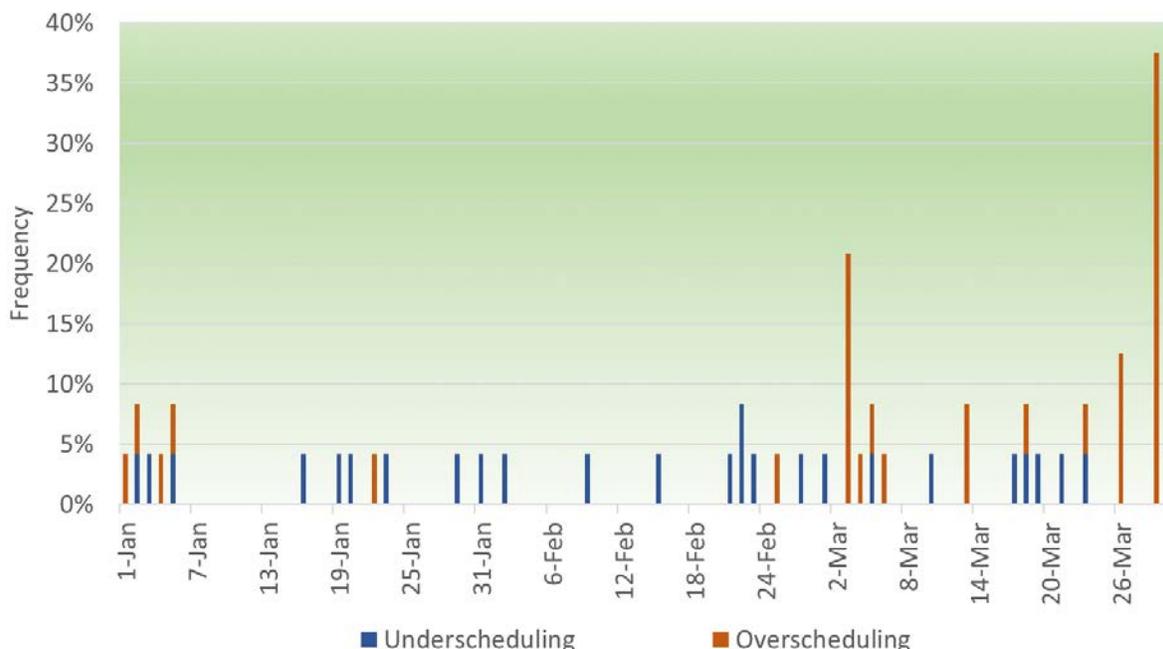


**Figure 43: Frequency of Balancing Test Failures for the PAC East BAA**



The APS BAA passed the balancing test in 97.4 percent of the hours and 46 percent of the failures were for under-scheduling conditions. The passing rate for the PSE BAA was approximately 99.3 percent of the hours and approximately two-thirds of infeasibilities were for under-scheduling conditions.

**Figure 44: Frequency of Balancing Test Failures for the APS BAA**



**Figure 45: Frequency of Balancing Test Failures for the PSE BAA**



Figures 46 through 50 represent the flexible ramping sufficiency test trends in each EIM entity's BAA for the first quarter of 2018. For the reported period, the PAC West BAA passed the balancing test in 99.7 percent of the hours; the PAC East BAA passed the test in 99.8 percent of the hours; the NV Energy BAA passed the test in 95.6 percent of the hours; the APS BAA passed the test in 98.7 percent of the hours; and the PSE BAA passed the test in 99.9 percent of the hours. All of these passing rates are within the expected range.

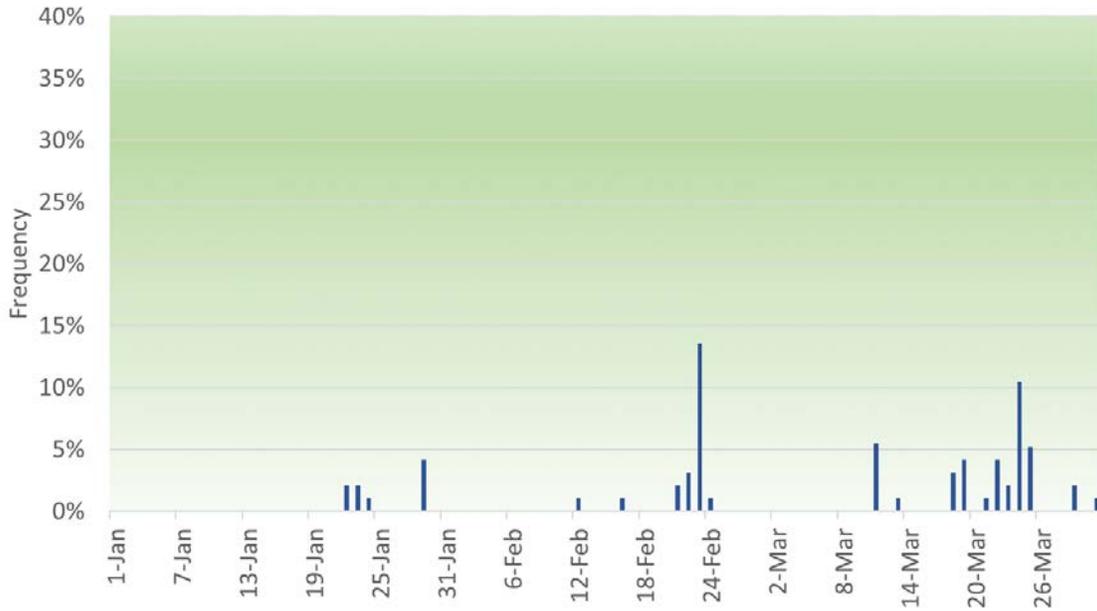
**Figure 46: Frequency of Flexible Ramping Sufficiency Test Failures in the PAC West BAA**



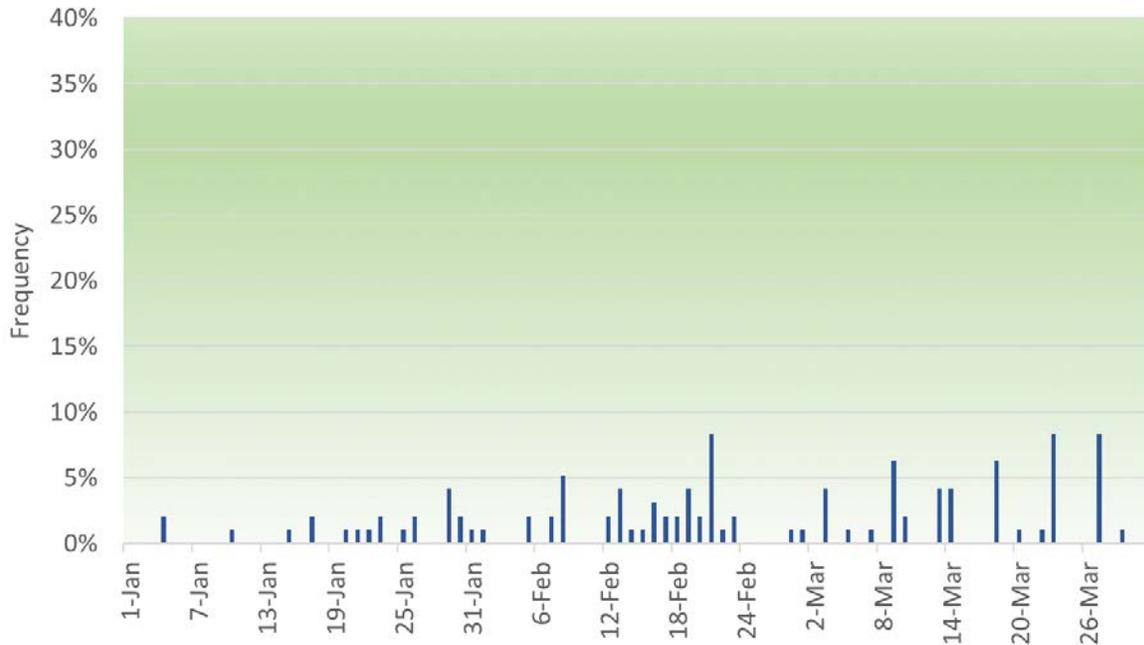
**Figure 47: Frequency of Flexible Ramping Sufficiency Test Failures in the PAC East BAA**



**Figure 48: Frequency of Flexible Ramping Sufficiency Test Failures in the NV Energy BAA**



**Figure 49: Frequency of Flexible Ramping Sufficiency Test Failures in the APS BAA**



**Figure 50: Frequency of Flexible Ramping Sufficiency Test Failures in the PSE BAA**



**D. Flexible Ramping Constraint Infeasibilities**

As described in the monthly EIM transitional period reports, the CAISO implemented the flexible ramping product on November 1, 2016. The flexible ramping product uses a price-responsive demand curve. Consequently, there no longer are constraint infeasibilities related to the flexible ramping constraint to report.

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 15<sup>th</sup> day of May, 2019.

*1st Grace Clark*

Grace Clark