

SVP Comments on 2017 Draft Final Policy Initiatives Roadmap

Submitted by	Company	Date Submitted
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In response to the CAISO’s request for feedback, Silicon Valley Power (SVP) submits the following comments on the CAISO’s 2017 Draft Final Policy Roadmap posted on December 15, 2016 (the “2017 Roadmap”) and the stakeholder call held on December 22, 2016.

SVP supports including the Congestion Revenue Rights (CRR) Auction Efficiency initiative as one of the four discretionary initiatives to be included in the 2017 Roadmap. Given the ongoing, large negative impacts to the parties that are funding the CAISO transmission costs, it is important to address this issue quickly. SVP is concerned, however, that the study process described by CAISO may make it difficult to implement changes prior to the next annual (for CY 2018) CRR allocation and auction processes. We therefore urge the CAISO to consider, as an interim measure, immediately reducing - from 50% to 0% - the set aside of the residual Scheduling Point import capacity in the monthly (after tier 1) and annual CRR (after tier 2) processes. Doing so will mitigate some of the negative impacts of this issue while longer term solutions are investigated.

SVP appreciates the opportunity to comment on this issue.