

Western Power Trading Forum Comments on the Market Design Initiatives Catalog

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WPTF appreciates the opportunity to submit comments on the CAISO's proposed Market Design Catalog Stakeholder process.

WPTF does not have feedback on specific initiatives at this time. However, WPTF would like to comment on the use of the "Non Discretionary" category. WPTF believes the use of this category will be counterproductive by creating a special class of ISO staff projects for which stakeholder input on importance is not relevant. We are also concerned that such a category causes a loss of transparency around project selection.

WPTF believes that the category of "FERC Mandated" is clear and with such projects linkages exist to FERC Orders, for example, that justify such a categorization and the timeline for implementation. However, the "Non Discretionary" categorization seems entirely subjective. Further, since the ranking mechanism includes such attributes as "Grid Reliability" and "Improving Overall Market Efficiency", a project that significantly improves reliability and/or market efficiency should on its own rank high. Thereby the designation of "nondiscretionary" is not needed.

Removing that category will create significantly more transparency, as the ranking will convey the drivers behind the project's selection. It will also allow all important projects to compete in the ranking process. We hope the ISO will trust that its criteria and ranking will produce credible results and that the ISO will thereby eliminate the "nondiscretionary" category.

Thank you for your consideration.