

WPTF Comments on Miscellaneous Tariff Changes

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November 29, 2010

1. WPTF offers the following comments regarding the CAISO's proposed tariff changes.
 - 1.3.2.f. Should the phrase "Protocol" be replaced by BPM?
 - 9.5.2 "ISO" should be "CAISO".
 - 11.5.6.3.2 Allocation of Costs from Exceptional Dispatch Calls to Condition 2 RMR Units.

This change seems substantive. Please explain.

- 11.29.7.3.4 The CAISO has struck the notification requirement. This seems substantive.

Please explain.

- 11.29.11 The tariff change to not have to remit payment is new. Please describe the rules under which a participant will be excused from payment and/or identify the BPM language that details this.
- 22.11.1.4 and 22.11.1.8 have proposed modifications to relieve the ISO of the obligation to prepare an impact analysis. Please explain the basis for this recommended change.
- 27.1.1 please explain the basis for making the LMP description not inclusive of the elements listed.
- 34.16.3.4 Voltage Support. Why is the ISO removing the .9 to .95 acceptable power factor limits?

2. In addition, WPTF asks that the CAISO consider the additional clarification in its set of proposed tariff modifications to Section 31.3.1.4 (eligibility to set DA LMP).

Section 31.3.1.4 provides that if a generating resource is constraining its inter-hour change in Schedule, the resource cannot be marginal and thus is not eligible to set the LMP. However, WPTF members have found that the CAISO does not allow units to set the LMP for various reasons (including for example, MIP Gap, etc.) even if a unit is not ramp constrained. WPTF ask that this tariff language be clarified to indicate more specifically under which conditions a unit can and cannot set the LMP.