

**Western Power Trading Forum on the CAISO's Proposed Revision Request 1360**  
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### The Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

### Summary

WPTF thanks the CAISO for this opportunity to provide comments on the Proposed Revision Request (PRR) 1360. Through PRR 1360, the CAISO is reflecting changes to the Market Operations BPM in anticipation of FERC approving the CAISO's Export, Load, and Wheeling Scheduling Priorities April 28<sup>th</sup> filing. Specifically, the CAISO outlines the criteria for, and priority order of, high priority wheels and exports within this PRR. While WPTF understands that the CAISO has been, and continues, operating under an expedited timeline to get the market changes in place for this summer, it's essential that the BPMs provide sufficient information such that market participants can fully understand the changes and new processes put into place. Thus, the comments below primarily seek clarification and more details to be added to the BPM to ensure all participants understand the nuances this new policy (if approved) introduces, especially as it relates to how the participants must engage with the CAISO in order to receive the high priority wheel and export designations.

### Detailed Comments

WPTF asks that the CAISO include additional detail regarding the process whereby scheduling coordinators provide the necessary information to the CAISO to qualify as a high priority wheel. Specifically, the CAISO notes in section 2.5.5.2.3 of the PRR that “[i]n order to qualify as a high priority wheel, the Scheduling Coordinator must provide such information to the CAISO (1) by June 29, 2021 for the months of July and August 2021, and (2) by 45 days prior to the applicable month for all months thereafter.” WPTF seeks additional information on how and what process the scheduling coordinators will use to provide the information. For example, will the information be provided via a CIDI ticket or require some type of documentation or attestation with the request for a new export system resource?

Within the same section the CAISO also notes that “[t]he Scheduling coordinator must notify the CAISO 45 days ahead of the month the MW quantity of the wheel and confirm that it has procured monthly firm transmission for the hours of delivery of the contract to the CAISO

boundary from an external balancing authority area.” Here again, WPTF would appreciate additional information regarding how and what process the SCs will use to provide this information to the CAISO. Additionally, is the 45 days ahead of the month only for months past July and August and for July and August it must be shown by June 29, 2021 to align with the contract showing timelines?

WPTF also has a few questions related to the firm transmission required for high priority wheeling transactions. First, if the source of the wheeling transaction is located at/near a CAISO intertie point, what, if any, transmission needs to be procured to qualify as a high priority wheel seeing that the source of the wheel through transaction is essentially already located at the CAISO BAA Boundary? Also, can the CAISO provide more information as to what types of firm transmission are acceptable? For example, would 7-FN transmission be sufficient to qualify as monthly firm transmission?

WPTF seeks additional clarification regarding the non-RA capacity that can be used to support high priority exports. First, WPTF believes it would be useful for the CAISO to define what is meant by non-RA capacity. For example, does non-RA capacity include RA that is purchased from a resource owner but not ultimately used by an LSE and listed on an RA plan or is it strictly capacity that has not been sold to any LSE in any RA month? Additionally, the CAISO’s BPM describes that the resource designated as supporting a PT export from its non-RA capacity “has been forward contracted with an external load serving entity.” However, WPTF would like to note that it could be the case that RA capacity from an internal resource has been sold to a non-LSE entity (such as a wholesale marketer) and the non-LSE entity may want to use that capacity to support a high priority export. Is it the CAISO’s intent to preclude the ability of the wholesale marketer from being able to use the RA capacity it has purchased from an internal resource to support a high priority export or can that contract qualify as the being able to use the internal resource to support the high priority export?

Lastly, WPTF would appreciate if the CAISO can confirm our understanding that for wheel through transactions if one leg of the wheel clears (e.g., the import leg), the other leg will always clear as well (e.g., the export leg) in *all* market processes (i.e., including RUC).

WPTF thanks the CAISO for consideration of these comments.