

**Comments of Boston Energy Trading and Marketing on  
CAISO's RA Enhancements Issue Paper**

Boston Energy Trading and Marketing ("Boston Energy") appreciates the opportunity to provide comments on the CAISO RA Enhancements issued Paper, released on October 22, 2018. Boston Energy supports the ISO's continued efforts to conduct a holistic review of its existing RA tariff provisions and make any necessary changes to ensure these issues are addressed and the ISO's RA tariff authority adequately supports reliable grid operations. Boston Energy is supportive of continued discussions on the seven items listed in the issue paper, but our comments focus on what is missing. Specifically, the CAISO issue paper is silent on improving the current Planned Outage Substitution Obligation (POSO) process. Boston Energy views improvements in this area as critically important to reliable grid operations and minimizing costs and uncertainty for scheduling coordinators. Boston Energy request the CAISO add the following issues to the potential scope of this initiative.

**POSO Moving Target**

CAISO releases a scheduling coordinators initial POSO by T-22 before the start of the RA month. Subsequent to that initial posting a scheduling coordinators obligation both in quantity and days can change daily and in some cases multiple times per day. This constant change in POSO is due to the CAISO's iterative process of running the planned outage analysis multiple times per day and taking into account changes to previous planned outages are made and new planned outages are entered.

While in theory this iterative process should help minimize POSO, however it's just not practical from a commercial contracting perspective, especially for scheduling coordinators who need to contract to fulfill POSO. Given the time it takes to contract for substitute capacity, waiting until the last minute to procure POSO is not realistic. This moving target ultimately leads to higher procurement costs and unnecessary uncertainty on behalf of the scheduling coordinator. The only way to ensure a scheduling coordinator meets its POSO obligation by the T-8 deadline is to always procure the initial POSO amount. Given this any efficiency the ISO expected to gain from the iterative POSO approach, aren't realized and ultimately result in higher costs to scheduling coordinators over procurement of RA.

**Cancellation of Planned Outages**

While the ISO tariff and BPM give CAISO the option to either (a) cancelled a planned outage or (b) subject the scheduling coordinator to RAAIM if a POSO obligation is not cured by the T-8 deadline, the CAISO has decided to ignore option (b) and instead cancel all planned outages. This decision to not allow a scheduling coordinator to take on the RAAIM obligation introduces significant reliability risks for resources who have been waiting to take planned outages after peak season. Further, these generators often times need to schedule specialized contractors to perform the planned outage work. Having to reschedule contractors due to cancelling planned outages, even with small POSO, puts grid reliability at an increased risk and increases costs to generators who now need to scramble to reschedule work that has been planned for months.

Both of the issues identified above are significant and should be addressed by the ISO immediately. A solution to address both this issues that would require no tariff changes, and can be implemented immediately, would be for the CAISO to give the scheduling coordinator the option, as the tariff and BPM envisioned, to accept the RAAIM obligation, rather than the CAISO unilaterally cancelling a planned outage.

**Submitted by,**

Michael Kramek  
Director, Market Policy & Regulatory Affairs  
Boston Energy Trading and Marketing LLC  
Cell: 617-279-3364  
Email: [michael.kramek@betm.com](mailto:michael.kramek@betm.com)