

## **Comments on CRR Auction Efficiency Track 1 Draft Final Proposal**

**February 26, 2018**

On February 13, 2018 California Independent System Operator (CAISO) hosted a Stakeholder meeting to discuss the Congestion Revenue Rights (CRR) Auction Efficiency Track 1 Draft Final Proposal which CAISO posted on February 8, 2018. California Department of Water Resources (CDWR) appreciates the opportunity to provide comments on the matter.

The proposed modifications in the Track 1 Draft Final Proposal appear to be a step in the right direction. However, CDWR encourages CAISO to give further consideration to separating the balancing accounts for allocated CRR's and auction CRR's to address the concerns raised in our previous comments on the December 19, 2017 working group meeting. As indicated in our previous comments, CDWR believes that LSEs are incurring costs due to shortfalls from the CRR Auction when they do not receive commensurate benefit from the Auction process.

If you have any questions, please contact Mike Ramsey, Transmission Planning Branch Chief, at 574-0313 or [mike.ramsey@water.ca.gov](mailto:mike.ramsey@water.ca.gov).