

CAISO New Participating Transmission Owner Update

Subscriber PTO Model:

Stakeholder Comments

Submitted by	Company	Date Submitted
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LS Power appreciates the opportunity to comment on the New Participating Transmission Owner Update - Subscriber PTO (SPTO) Model miscellaneous stakeholder meeting that CAISO held on August 1, 2022. Our comments are in the form of questions in an effort to obtain additional clarification on the proposal and how the SPTO model will work.

1. Will the TransWest Express (TWE) transmission line be placed under CAISO's operational control if TWE becomes a CAISO SPTO?
 - a) If so, how will this operational control differ from the operational control CAISO has on other PTO's transmission facilities?
 - b) In particular, if the transmission capacity of the line is almost fully subscribed and held by an entity outside CAISO, will CAISO have any operational control at all?
 - c) If CAISO needs access to this transmission capacity for reliability reasons will it be accessible?
 - d) Will the transmission capacity that is part of SPTO be optimized through the market?
 - e) Will CAISO have operational control over the DC terminals on TWE?
 - f) Will the CAISO need to include TWE's transmission capacity in its Operating Reserves calculations? If so, please explain how the CAISO plans to approach this aspect in setting Operating Reserve requirements.
2. Will CAISO be able to dispatch generation associated with a subscription to the line under the SPTO construct? Please describe if CAISO would be able to dispatch the subscriber generation economically or only to reduce flows for reliability purposes.
 - a) What about generation that is connected to the line but not associated with a subscriber? Please describe the prioritization that would be afforded non-subscriber generation schedules as compared to subscriber generation schedules.

3. How will the existing market and settlement processes be affected by this implementation?
 - a) LS Power suggests that CAISO provide examples of scenarios with subscribed and non-subscribed use of the line in each direction and potential interactions with existing market and settlement processes for stakeholders to fully understand the implications.
4. How will the existing Maximum Import Capability (MIC) at the Eldorado intertie be impacted?
 - a) Will the CAISO conduct a study to identify if there are any downstream constraints triggered by the new 1500 MW injection between Harry Allen Eldorado? If so, when and how?
 - b) Where are new proposed MIC points and what will the capacity associated with those new MIC points be?
 - c) Which TPP cycle will the new MIC points be established?
 - d) How will SPTO subscribers be allocated MIC on any new or existing MIC branch groups to enable interim deliverability for RA imports as described by CAISO?
 - i. How does this allocation fit into CAISO's existing tariff authority regarding MIC provisions?
 - ii. Would other non-subscriber LSEs be eligible to receive allocations on the same MIC points?
5. With CAISO BAA expansion to Wyoming, will there be a new Branch Group (BG), Market Scheduling Limits (MSL), and/or Scheduling point at the new intertie with PacifiCorp East (PACE)?
6. Will generators in Cluster 15 connecting to the SPTO line sign an Interconnection Agreement with CAISO and be governed by the CAISO tariff, or will they be governed by the SPTO OATT?
 - a) How will CAISO be able to dispatch these generators if it has no control over the SPTO subscribed transmission capacity?
 - b) Will a generator delivering capacity to LADWP via a connection to the SPTO line go through the CAISO interconnection process? If so, would the CAISO market processes treat these LADWP subscriber transfers similarly to other SPTO subscriber transfers, as ETC/TOR-like encumbrances?
 - c) Is the SPTO line under CAISO control such that it is CAISO administering the interconnection process irrespective of delivery point?