

Stakeholder Comments

Subject: Day-Ahead Market Enhancements Phase 1

Submitted by	Company	Date Submitted
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Western Area Power Administration (WAPA) is a federal agency responsible for marketing hydropower generated by the federal Central Valley Project (CVP) to meet its statutory responsibilities to serve project-use energy pumping requirements and market available hydropower generation under its Power Marketing Plan to preference power allottees. In northern California, WAPA serves load in both the Balancing Authority of Northern California and the ISO. WAPA delivers its generation from many large and small hydro facilities of the CVP to its loads. WAPA owns, operates and maintains an extensive high voltage transmission network extending to the load center of Northern California.

WAPA appreciates the opportunity to provide comments on the ISO's Third Revised Straw Proposal on Day Ahead Market Enhancements. WAPA requests the ISO reconsider its proposal to change the bid submission deadline for the DA market from 10 am to 9:30 am. Many bilateral trades and other scheduling activities occur before the ISO's bid submission deadline. Particularly this proposed change will leave WAPA only 30 minutes to update its energy schedules on PACI using its TOR because recently the ISO has already changed its Operating Procedure 3640 to allow the DA market to consider transmission de-rate observed as late as 9 am in its ETCC. Previously ETC/TOR holders had 2 hours to adjust energy schedules and related bilateral trades between 8 am and 10 am. The combination of the changes in OP 3640 and this new DAME proposal would reduce the time available for ETC/TOR changes from 2 hours to 30 minutes. This makes scheduling ETC/TOR extremely difficult. WAPA urges the CAISO to honor ETC/TOR with reasonable and practical market mechanisms.