

Western Power Trading Forum Comments on Post-Contingency Modeling Enhancement Revised Straw Proposal

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July 5, 2013

WPTF appreciates the opportunity to submit comments in response to the ISO's revised straw proposal.

Please refer to WPTF's prior comments, as our positions remain essentially the same.

The CAISO's stakeholder matrix seemed to not respond to WPTF's prior points on transparency, and we ask you to consider again how transparency will be provided regarding the constraints enforced and their market impacts (e.g., clearing prices, etc.). We would also like more information at this time to confirm which constraints and contingencies will be modeled through this mechanism.

We also wish to re-emphasize our support for a market-based product to address the contingency needs rather than continued reliance on minimum on-line constraints and exceptional dispatch. WPTF can see benefits to clarifying the reliability requirements as the IOUs have requested. Yet ultimately the needs require a solution that provides transparency and proper pricing. As a result we support the ISO continuing to work toward a new market solution for these needs.