

Western Power Trading Forum Comments on Aliso Canyon Gas-Electric Coordination Phase 3 Draft Final Proposal

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About the Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency in order to facilitate transactions among market participants. The membership of WPTF includes load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities, all of which participate actively in the California market and other such markets in the West and across the country.¹

WPTF does not oppose the ISO's proposal to extend Aliso Canyon measures to the entire footprint and make them permanent, subject to scalar rule change.

WPTF appreciates the ISO's sincere and thoughtful responses to all stakeholder questions, including our own. The ISO's explanation as to why extending the Aliso Canyon measures to the entire footprint would help to protect reliability under certain extreme conditions is reasonable; however, it should be noted that no other ISO has such authority to disrupt the market in such a way, and that under the EIM, the individual balancing authorities remain responsible for ensuring the reliability of their system.

The lack of opposition for this initiative is contingent upon the existing SoCal commitment cost scalars remaining in place at the current level (or greater) and being applied at the same (or greater) level to the entire footprint until an appropriate market-based solution is implemented through the CCDEBE initiative.

Thank you for considering our comments.

¹ A member list can be found [here](#) and these comments do not necessarily represent individual member views.