

## Stakeholder Comments: Aliso Canyon Gas Electric Coordination

Submitted by	Company	Date Submitted
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Wellhead appreciates the opportunity to provide comments to the Aliso Canyon Gas Electric Coordination.

As the CAISO has correctly identified, fast start units being committed in the RTM have little to no ability to nominate their gas, but these units are critical to the reliability of the CAISO system.

In general, Wellhead supports all of the CAISO potential solutions as an interim fix, but specifically Wellhead sees the ability of units to submit outage cards to manage their own fuel constraints as a necessary functionality. And CAISO should ensure that fuel constraint outage cards flow through to the RAIM calculations so that fast start units are not unduly penalized for constraints on the gas system. Wellhead also believes that it will be necessary to change the commitment process during periods when the gas system is constrained to limit RTM instructions to exceptional dispatches. The CAISO should communicate to SCs that this action is being taken to avoid unnecessary fuel constraint outage cards. Wellhead believes these two items will go a long way to ensure the reliability of the electric system while not causing a reliability problem on the gas system.

Additionally, Wellhead supports CAISO's efforts to accelerate Bidding Rule Enhancements, specifically to allow re-bidding of commitment costs in the RTM based upon the intraday gas prices and estimates of non-compliance charges.