

Stakeholder Comments: Aliso Canyon Gas Electric Coordination Straw Proposal

Submitted by	Company	Date Submitted
<i>Grant McDaniel Dan Richardson Doug Davie</i>	<i>Wellhead</i>	<i>4/21/16</i>

Wellhead appreciates the opportunity to provide comments to the Aliso Canyon Gas Electric Coordination Straw Proposal.

Wellhead agrees with the CAISO that moving the timing of their DA market to better coincide with the timing of GD1 or GD2 will potentially make matters worse. Wellhead supports the CAISO's proposal to publish the 2DA advisory results in CMRI.

Wellhead supports the Gas Availability Constraint but recommends that the constraint leave headroom for RT uncertainty any time this constraint binds in the DA. Wellhead believes the use of this constraint will be much more efficient than relying on outage cards alone under the CAISO's operating procedure 4120.

Wellhead supports the Gas Balancing Constraint as an appropriate tool to manage an area's gas burn within a balancing band; provided that appropriate headroom was scheduled in the Gas Availability Constraint to account for RT uncertainty (assumes that the Gas Balance Constraint will only bind when the Gas Availability Constraint also binds in the DA). Wellhead strongly recommends that the CAISO pursue SoCal Gas waiver of noncompliance charges to individual generators following RTM instructions when this constraint is enforced.

Wellhead supports the CAISO reserving internal transfer capability on Path 26 in day-ahead for real-time use that is consistent with Gas Availability and Gas Balancing Constraints.

Given the compressed time schedule for implementation, Wellhead supports the CAISO using the volume weighted average price of gas trades for commitment costs and DEBs for RT re-dispatch. Wellhead encourages the CASIO to continue, and accelerate where possible, its commitment cost bidding improvements initiative.