

FERC TECHNICAL CONFERENCE
CAISO MRTU SEAMS ISSUES
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PANEL 1: OPERATIONAL SEAMS BETWEEN CAISO AND OTHER SYSTEMS
(INCLUDING SYSTEMS WITHIN CAISO'S FOOTPRINT)

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The Salt River Project urges that the following five issues be made formal Readiness Metrics that must be completed prior to implementation of MRTU:

- 1.) The CAISO should conduct base case simulations of control area-to-control area reliability impacts to initially quantify reliability impacts arising from MRTU economic dispatch, the Full Network Model and Locational Marginal Pricing. These studies should be peer-reviewed and conducted in a collaborative process with neighboring control areas. As is customary in the WECC and prudent in light of major market and operational changes, any identified reliability issues must be mitigated to hold harmless other control areas.
- 2.) The CAISO should commit to compliance with the WECC Unscheduled Flow Procedures, and specifically agree to exhaust all internal means, including dispatch of uneconomic generating units in the CAISO control area, prior to seeking curtailments and other mitigation steps from imbedded and bordering control areas.
- 3.) The CAISO tariff should clearly provide for the protection of firm exports from partial Resource Adequacy Units.
- 4.) As has been done with eastern RTOs and ISOs and their respective neighboring control areas, an open and neutral standing committee should be developed to timely identify and mitigate existing and future seams issues, including mandatory CAISO tariff provisions to comply with identified mitigation requirements.
- 5.) The CAISO should develop a comprehensive contingency plan to ensure an orderly discontinuation of any MRTU elements as may be found to threat reliability in the WECC after implementation. This contingency plan should be cooperatively developed with neighboring control areas and should be peer-reviewed. A well-developed plan will help insulate the Western Interconnection from any reliability issues created by the operation of the new market design in California and will help avoid lingering and wide-spread operational problems as were experienced in prior California market designs.