

WESTERN ENERGY IMBALANCE MARKET

Briefing on system market power mitigation

Brad Cooper

Senior Manager, Market Design Policy

EIM Governing Body Meeting

December 4, 2019

General Session



Management committed to briefing Board on its approach for addressing system-level market power.

- Analyses showed system-level market power in the ISO balancing authority area may exist in limited periods
 - Supply conditions expected to tighten
- Management subsequently worked with stakeholders and the Market Surveillance Committee to develop its approach
 - Developed high-level design proposal to serve as basis for discussion and provide design principles
 - Market Surveillance Committee provided written opinion on proposed approach

Management considered several factors in developing its approach:

- Not deterring import supply
- Leveraging existing local market power mitigation measures to the extent possible
- Implementing measures relatively quickly
- Accounting for other upcoming ISO market changes

Management developed a high-level mitigation design that avoids potential adverse impacts.

- Potential adverse impacts include:
 - Inefficiencies resulting from inaccurate mitigated bid prices
 - Deterring import supply
 - Diminished incentives to forward contract
- Approach needs to be able to be timely implemented

Management will be initiating a stakeholder process to develop a system-level market power mitigation design.

- Planning phased approach
- First phase will implement system-level market power mitigation in the real-time market
- Proposed approach is similar to balancing authority area level mitigation for non-ISO balancing authority areas in EIM
- Demand bids and virtual bids provide level of market power protection in the day-ahead market
- Market power mitigation for day-ahead market involves more complicated design and implementation
- Not proposing to apply mitigation to import bids or to change EIM mitigation

Second phase will consider more comprehensive measures:

- Approach for day-ahead market
 - Needs to be consistent with extended day-ahead market design
- Improvements to market power mitigation tests, including for the broader EIM
 - Test competitiveness by groups of BAAs rather than individually
 - Consider alternative tests for triggering mitigation

Stakeholders are divided on the need for system-level market power mitigation.

- Suppliers maintain ISO analyses have not shown that there is system-level market power
 - They suggest ISO should instead focus on other important market enhancements
 - Nevertheless, they support the proposed approach if we move forward
- California investor owned utilities and CPUC maintain ISO implementing system-level market power mitigation is critically important

Next Steps

- Post system-level market power mitigation straw proposal later this month
- May 2020 EIM Governing Body briefing and ISO Board of Governors decision