WESTERN ENERGY IMBALANCE MARKET

Department of Market Monitoring Update

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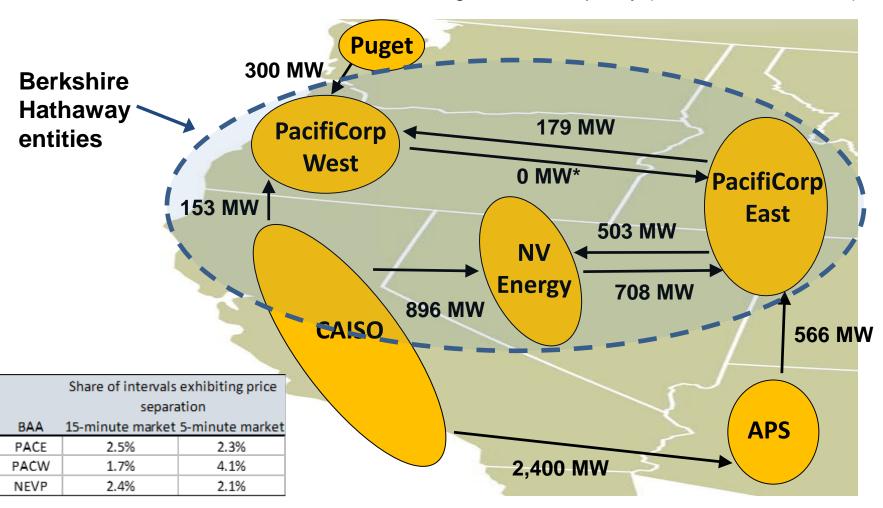
DMM actively supporting market-based rates for EIM participants

- Several EIM participants subject to special bidding limits imposed by FERC
 - Berkshire Hathaway entities (PacifiCorp, NV Energy) and APS
 - Must submit energy bids at or below cost-based Default Energy Bids (DEBs) all hours
 - DEBs intended for use only when ISO's automated market power mitigation provisions triggered
- New EIM participants must apply for market-based rates
- Analysis by DMM supports finding that special FERC bidding limits no longer needed:
 - EIM areas area structurally competitive almost all intervals
 - ISO rules effectively mitigate market power when an EIM area is not structurally competitive



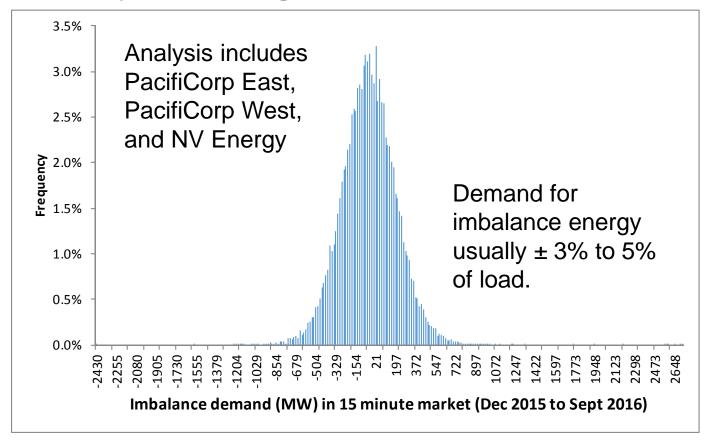
Growth in EIM transfer capacity has significantly increased market competiveness

Total average transfer capacity (Oct 2016 – Jan 2017)





Demand for imbalance energy in combined Berkshire Hathaway balancing areas

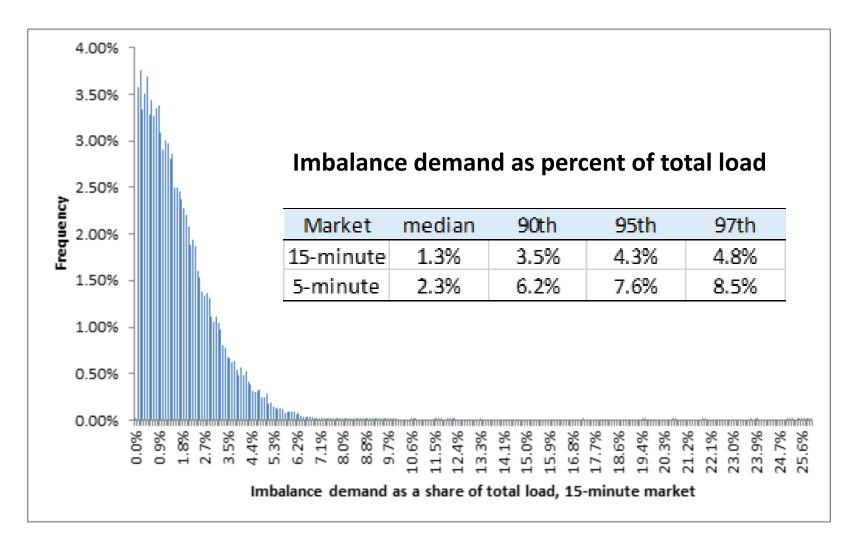


Structural competiveness of the energy imbalance market: Analysis of market power of the Berkshire Hathaway entities, June 29, 2017, Department of Market Monitoring,

http://www.caiso.com/Documents/AnalysisofMarketPoweroftheBerkshireHathawayEntities.pdf

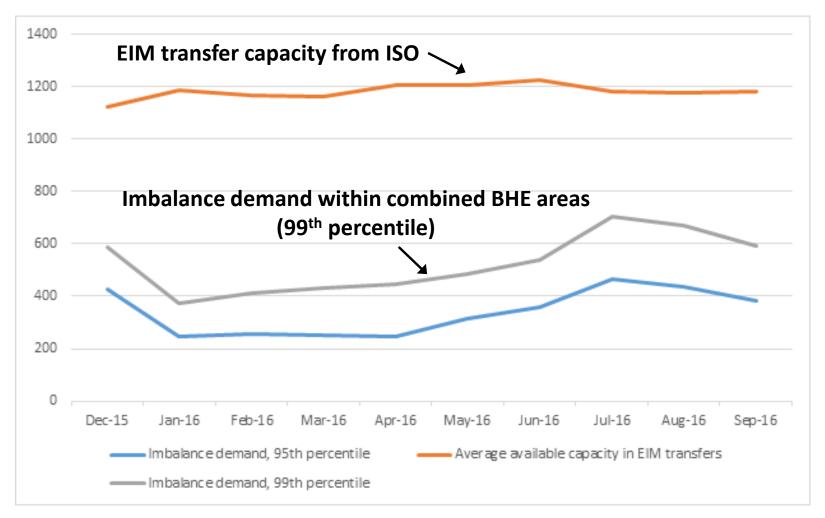


Demand for imbalance energy in combined Berkshire Hathaway balancing areas as percent of total load





Transfer capacity from ISO exceeds imbalance demand by large margin almost all intervals





Berkshire Hathaway entities are potentially pivotal very small portion of intervals

Share of intervals with imbalance demand greater than transfer capacity		
	15-minute market	5-minute market
Dec-15	0.3%	1.8%
Jan-16	0.0%	2.6%
Feb-16	0.0%	0.3%
Mar-16	0.0%	2.0%
Apr-16	0.0%	3.0%
May-16	0.0%	1.8%
Jun-16	0.0%	2.8%
Jul-16	0.2%	1.6%
Aug-16	0.0%	1.6%
Sep-16	0.3%	0.3%
	0.1%	1.8%
	1	

Automated bid mitigation procedures effectively mitigate structural market power in these intervals.



Improvements to automated real-time bid mitigation procedures have been successfully implemented

- Bid mitigation triggered only when EIM areas are projected to be separated from rest of system by congestion
- Improvements have been implemented to reduce intervals when congestion not correctly projected in real-time
- Reduction in under-mitigation in 2017:
 - Reduced from 17% to 1.5% in 15-minute market (Jan-June)
 - Reduced from 40% to 9% in 5-minute market (May-June)
- Automated bid mitigation procedures effectively mitigate market power during small portion of intervals when EIM areas not structurally competitive

