

Comments of Viasyn
Energy Imbalance Market Draft Tariff Language

Submitted by	Company	Date Submitted
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Viasyn appreciates the opportunity to offer these comments on CAISO's Energy Imbalance Market Draft Tariff Language.

Viasyn supports the Draft Tariff Language, but requests CAISO further examine the two sections, 29.4(c)3 and 29.4(e)3(c), highlighted below.

29.2 Access To EIM.

- (a) **In general.** The CAISO shall—
 - (1) provide open and non-discriminatory access to the EIM in accordance with the provisions in the CAISO Tariff; and
 - (2) make available for use in the EIM the transmission capacity on the CAISO Controlled Grid that is available in real-time and the transmission capacity an EIM Entity registers in the EIM Transmission Service Registry that is available in real-time, based on its transmission ownership and contractual rights.
- (b) **Access as an EIM Entity.**
 - (1) **Implementation Agreement.** A Balancing Authority that wishes to become an EIM Entity must first execute an implementation agreement with the CAISO that establishes—
 - (A) the activities the parties must undertake to enable the Balancing Authority to participate in the EIM;
 - (B) the date upon which the Balancing Authority will become an EIM Entity; and
 - (C) the implementation fee the Balancing Authority must pay to the CAISO for the start-up costs the CAISO incurs.
 - (2) **FERC Approval.** The implementation agreement must be accepted by FERC not less than six months and not more than twenty-four months before the date on which the Balancing Authority is to become an EIM Entity.
 - (3) **Implementation Period.** The CAISO shall in its discretion determine the required length of the implementation period based on the complexity and compatibility of the Balancing Authority's system and the planned timing of the CAISO's implementation of software enhancements.

29.3 [Not Used]

29.4 Roles And Responsibilities.

- (a) **CAISO Balancing Authority Obligations.**
 - (1) **Reliability Responsibilities.** Nothing in Section 29 shall alter the CAISO's responsibilities under the other sections of the CAISO Tariff, under any agreement not required by Section 29, or under NERC Reliability Standards and WECC Reliability Standards and Regional Criteria, as the Balancing Authority for the CAISO Balancing Authority Area and the transmission operator for the CAISO Controlled Grid.

- (2) **Operating Responsibilities.** During any interruption of the normal operation of the EIM, the CAISO as Balancing Authority shall remain responsible for managing the resources in its Balancing Authority Area, and the flows on transmission lines internal to the CAISO Balancing Authority Area, including imports and exports, for the duration of the interruption.

- (b) **EIM Entity.**
 - (1) **Balancing Authority Obligations.**
 - (A) **EIM Entity as Balancing Authority.** An EIM Entity must be a Balancing Authority registered with NERC.
 - (B) **Reliability Responsibilities.** Nothing in Section 29 shall alter an EIM Entity's responsibilities under NERC Reliability Standards and WECC Reliability Standards and Regional Criteria as the Balancing Authority for the EIM Balancing Authority Area and, to the extent applicable, as the transmission operator for transmission facilities within its Balancing Authority Area.
 - (C) **Operating Responsibilities.** During any interruption of the normal operation of the EIM, the EIM Entity as Balancing Authority shall remain responsible for managing the resources in its Balancing Authority Area and the flows on internal transmission lines, including imports into and exports out of its Balancing Authority Area, for the duration of the interruption.
 - (D) **Inadvertent Energy.** An EIM Entity remains responsible for tracking inadvertent energy and administering the payback of inadvertent energy for its Balancing Authority Area through processes established by WECC.
 - (2) **EIM Entity Agreement.** An EIM Entity must execute an EIM Entity Agreement no later than ninety (90) days before the date upon which the Balancing Authority intends to become an EIM Entity;
 - (3) **EIM Obligations.** An EIM Entity shall--
 - (A) perform the obligations of an EIM Entity under the EIM Entity Agreement and Section 29;
 - (B) have provisions in effect in its Open Access Tariff and ensure that each EIM Transmission Service Provider in its Balancing Authority Area has provisions in effect in its Open Access Tariff, as necessary, to enable the EIM in its Balancing Authority Area;
 - (C) perform the obligations of an EIM Entity in accordance with the EIM Entity Agreement, Section 29, and other provisions of the CAISO Tariff that by their terms apply to EIM Entities;

- (D) qualify as or secure representation by no more than one EIM Entity Scheduling Coordinator;
 - (E) review and validate information about available transmission capacity submitted to it by an EIM Transmission Service Provider and transmit such validated information to its EIM Entity Scheduling Coordinator;
 - (F) provide the CAISO and EIM Entity Scheduling Coordinator with information regarding the transmission capacity available to the EIM, including any transmission system information regarding constraints that it observes;
 - (G) define Load Aggregation Points in its Balancing Authority Area; and
 - (H) determine which resource types and transmission service providers are eligible to participate in the EIM within the EIM Entity Balancing Authority Area.
- (4) **EIM Termination.**
- (A) **EIM Entity Agreement.** An EIM Entity that wishes to terminate participation in the EIM must terminate the EIM Entity Agreement pursuant to its terms.
 - (B) **Notice.** Delivery to the CAISO of a written notice of termination shall represent the commitment by the EIM Entity to undertake all necessary preparations to disable the EIM within the EIM Entity Balancing Authority Area.
 - (C) **Actions Following Notice.** Upon receipt of such notice, the CAISO shall undertake all necessary preparations to disable the EIM within the EIM Entity Balancing Authority Area, which shall be outlined in the Business Practice Manuals, including public notice to Market Participants within ten (10) days.
- (c) **EIM Entity Scheduling Coordinator.**
- (1) **Certification.** An EIM Entity Scheduling Coordinator must meet or have met the certification requirements in Section 4.5.1 for a Scheduling Coordinator.
 - (2) **EIM Entity Scheduling Coordinator Agreement.** An EIM Entity Scheduling Coordinator must enter an EIM Entity Scheduling Coordinator Agreement with the CAISO, which shall satisfy the obligation to enter a Scheduling Coordinator Agreement under Section 4.5.1 with regard to its representation of the EIM Entity.
 - (3) **Representation.** An EIM Entity Scheduling Coordinator–

(A) may represent a Market Participant other than an EIM Entity, but only if it enters a Scheduling Coordinator Agreement under Section 4.5.1 with regard to such Market Participant;

(B) may not also be an EIM Participating Resource Scheduling Coordinator; and

(C) may represent more than one EIM Entity if it has certified to the CAISO in the manner described in the Business Practice Manual that each EIM Entity of the multiple representation has authorized it to represent each other EIM Entity.

(4) **Obligations.** An EIM Entity Scheduling Coordinator shall—

(A) perform the obligations of an EIM Entity Scheduling Coordinator under the EIM Entity Scheduling Coordinator Agreement and Section 29;

(B) perform the obligations of a Scheduling Coordinator under such other provisions of the CAISO Tariff as apply by their own terms, except as provided otherwise in Section 29;

(C) obtain any transmission service necessary for the EIM Entity it represents to participate in the EIM under the terms of the CAISO Tariff or the tariff of another transmission service provider, as applicable;

(D) register in the manner set forth in the Business Practice Manual, all EIM Participating Resources of each EIM Entity it represents, and all non-participating resources in each EIM Entity Balancing Authority Area, and update such information in a timely manner;

(E) submit the interchange schedules with other Balancing Authorities at the defined interchange scheduling points, including creating and processing e-tags in accordance with NERC, NAESB, and WECC standards and business practices for bilateral schedules between Balancing Authority Areas that are arranged no less than 20 minutes in advance of the operating interval of the EIM and that are included in an EIM Resource Plan;

(F) match e-Tags and manage schedule curtailments at the defined interchange scheduling points with other Balancing Authorities;

(G) register information in the EIM Transmission System Registry; and

(H) settle all financial obligations arising out of the EIM for the EIM Entity, including financial settlement with non-participating resources and non-participating load within the EIM Entity Balancing Authority Area.

(d) **EIM Participating Resource.**

Sean Breiner 12/4/13 4:02 PM

Comment [1]: Can ISO clarify why an EIM Entity SC cannot represent an EIM Participating Resource, but can represent a CAISO Participating Resource? Should not both cases be treated the same?

- (1) **Eligibility.** Resources, including generating units, physical scheduling plants, participating loads, proxy demand resources, non-generator resources and dynamic transfers are eligible to become an EIM Participating Resource if the resource—
 - (A) meets the eligibility requirements established by the EIM Entity in whose Balancing Authority Area the resource is located;
 - (B) is capable of delivering energy, curtailable demand, demand response services, or similar services within the time specified by Section 29 for the EIM market in which it will submit bids; and
 - (C) meets California Air Resources Board registration and reporting requirements.
 - (2) **EIM Participating Resource Agreement.** An EIM Participating Resource must execute an EIM Participating Resource Agreement.
 - (3) **Obligations.** An EIM Participating Resource shall—
 - (A) perform the obligations of an EIM Participating Resource under the EIM Participating Resource Agreement and Section 29;
 - (B) perform the obligations of Market Participants and resources under such other provisions of the CAISO Tariff as apply by their own terms, except as provided otherwise in Section 29;
 - (C) if it is a generating unit, participating load, proxy demand resource, or other qualified resource, perform the obligations required of the resource under such other provisions of the CAISO Tariff as apply by their own terms, except as specifically provided otherwise; and
 - (D) register in the Compliance Instrument Tracking System Service of the California Environmental Protection Agency Air Resources Board.
- (e) **EIM Participating Resource Scheduling Coordinator.**
- (1) **Certification.** An EIM Participating Resource Scheduling Coordinator must be either an existing Scheduling Coordinator or must meet or have met the certification requirements in Section 4.5.1 for a Scheduling Coordinator.
 - (2) **EIM Participating Resource Scheduling Coordinator Agreement.** An EIM Participating Resource Scheduling Coordinator must enter an EIM Participating Resource Scheduling Coordinator Agreement with the CAISO, which shall satisfy the obligation to enter a Scheduling Coordinator Agreement under Section 4.5.1 with regard to its representation of the EIM Participating Resource.

- (3) **Representation.** An EIM Participating Resource Scheduling Coordinator–
- (A) may represent a Market Participant other than an EIM Participating Resource, but only if it enters a Scheduling Coordinator Agreement under Section 4.5.1 with regard to such Market Participant;
 - (B) may not also be an EIM Entity Scheduling Coordinator;
 - (C) may represent more than one EIM Participating Resource if it has certified to the CAISO in the manner described in the Business Practice Manual that each EIM Participating Resource of the multiple representation has authorized it to represent each other EIM Participating Resource; and
 - (D) may represent resources in other CAISO markets by entering into a Scheduling Coordinator Agreement under Section 4.5.1.1.11.
- (4) **Obligations.** An EIM Participating Resource Scheduling Coordinator must–
- (A) perform the obligations of an EIM Participating Resource Scheduling Coordinator under the EIM Participating Resource Scheduling Coordinator Agreement and Section 29;
 - (B) perform the obligations of a Scheduling Coordinator under such other provisions of the CAISO Tariff as apply by their own terms, except as specifically provided otherwise;
 - (C) obtain any transmission service necessary for the entity it represents to participate in the EIM under the terms of the CAISO Tariff or the tariff of another transmission service provider, as applicable;
 - (D) register in the manner set forth in the Business Practice Manual, all EIM Participating Resources that it represents, provide such information to the EIM Entity Scheduling Coordinator, and update such information in a timely manner; and
 - (E) ensure that the EIM Participating Resources it represents are registered in the Compliance Instrument Tracking System Service of the California Environmental Protection Agency Air Resources Board.

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Comment [2]: Can ISO clarify this requirement? This is not required for existing SCs representing CAISO Participating Resources and will not be required for EIM PR SCs that represent CAISO Participating Resources. This appears unduly burdensome and unnecessary.

29.5. [Not Used]

29.6 Communications.

- (a) **EIM Entity.** The EIM Entity shall meet the technical and communication requirements provided in the Business Practice Manuals, which shall be based