

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System
Operator Corporation

Docket No. ER16-2023-000

**MOTION TO INTERVENE AND PROTEST OF THE WESTERN POWER TRADING
FORUM, THE ELECTRIC POWER SUPPLY ASSOCIATION AND THE
INDEPENDENT ENERGY PRODUCERS ASSOCIATION**

Pursuant to Rules 211, 212 and 214 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure¹ and the Commission’s May 9, 2016 Combined Notice of Filings #2, the Western Power Trading Forum (“WPTF”), the Electric Power Supply Association (“EPSA”) and the Independent Energy Producers Association (“IEP”) (together, the “Joint Commenters”) hereby move to intervene, protest and comment in the above-captioned proceeding regarding the California Independent System Operator Corporation’s (“CAISO”) June 24, 2016, filing proposing amendments to its tariff (“CAISO Tariff” or “Tariff”) to implement a Flexible Ramping Product (“FRP”).²

I. COMMUNICATIONS

Communications in connection with this filing should be addressed to:

¹ 18 C.F.R. §§ 385.211–385.212, 385.214 (2015).

² See *Cal. Indep. Sys. Operator Corp.*, Tariff Amendment to Implement FRP, Docket No. ER16-2023-000 (filed June 24, 2016) (“FRP Tariff Amendment”). Citations herein to “Transmittal Letter” or specific Exhibits refer to the various pieces of the FRP Tariff Amendment filing.

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II. MOTIONS TO INTERVENE IN DOCKET ER16-2023-000

A. Overview of WPTF

WPTF is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports development of competitive markets throughout the West and of uniform rules to facilitate transactions among market participants. The membership of WPTF includes energy service providers, scheduling coordinators, generators, power marketers, financial institutions, energy consultants, and public utilities, all of which participate actively in the California market and other such markets in the West and across the country. WPTF's intervention in this proceeding is in the public interest. WPTF's interests will not be adequately represented by any other party. WPTF therefore respectfully requests that this motion to intervene be granted.

B. OVERVIEW OF IEP

IEP is a nonprofit public benefit corporation formed under the laws of the State of California to encourage the development and use of independent electric resources. Its members own and operate roughly 20,000 megawatts of electric generation capacity in California. IEP has been representing the interests of the developers and operators of renewable and other independent electricity resources before the Commission, other agencies, the Legislature, and the courts since 1982. IEP's intervention in this proceeding is in the public interest. IEP's interests will not be adequately represented by any other party. Therefore, IEP respectfully requests that the Commission grant its motion to intervene in this proceeding.

C. OVERVIEW OF EPSA

EPSA is the national trade association representing leading competitive power suppliers, including generators and marketers. Competitive suppliers, which collectively account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities serving power markets. EPSA seeks to bring the benefits of competition to all power customers. The comments contained in this filing represent the position of EPSA as an organization, but not necessarily the views of any particular member with respect to any issue. EPSA filed a motion to intervene in this proceeding on June 28, 2016.

III. BACKGROUND

On October 7, 2011, the CAISO submitted proposed amendments to its tariff to implement a flexible ramping constraint ("FRC") in its real-time market processes and provide opportunity cost-based compensation. On October 28, 2011, WPTF submitted a Motion to Intervene and Protest ("WPTF FRC Protest"), discussing the importance of ramping in

California and arguing that the ramping service warranted a bid-based procurement mechanism.³ The Commission in its December 12, 2011 Order (“December 2011 FRC Order”) did not accept the CAISO’s proposed FRC opportunity cost compensation, indicating that it may not be just and reasonable and set the matter for settlement.⁴ The Commission stated that it was not clear why non-contingent spinning reserve services were paid an ancillary service clearing price and FRC was only compensated based on a resource’s opportunity cost.⁵ Finally, the Commission noted the CAISO’s explanation that it was currently in the process of creating a permanent flexible ramping product as a new ancillary service, and urged the CAISO to continue its work toward a bid-based flexible ramping product.⁶

After several settlement conferences, the parties reached settlement with regards to compensation and cost allocation for the FRC, which the CAISO filed on July 27, 2012.⁷ The Commission accepted the uncontested settlement in a letter order issued on October 3, 2012.

Between 2011 and 2016 the CAISO conducted numerous stakeholder engagement activities and wrote, and re-wrote, proposed policy documents regarding the development of the FRP.⁸ On June 24, 2016, the CAISO filed its proposal to implement the FRP.⁹

IV. COMMENTS AND LIMITED PROTEST

The Joint Commenters’ members have been active participants in the FRP development process since the CAISO’s proposed FRC prior to 2011, and have participated with the objective

³ WPTF FRC Protest, pp. 1, 2, 4, 8, 11, 12 and 14.

⁴ December 2011 FRC Order at 27.

⁵ Id. at 28.

⁶ Id. at P 30.

⁷ CAISO Offer of Settlement, ER12-50. July 27, 2012.

⁸ Transmittal Letter, p. 10.

⁹ FRP Tariff Amendment.

of developing a product that enhances the energy market optimization and provides price signals on the need for flexible capability. The FRP design has changed significantly from the CAISO's initially proposed design for a bid-based product in the day-ahead and real-time markets.¹⁰ Other changes to the design have included modifications of the requirement methodology and cost allocation structure.¹¹ Some of these design changes have been positive. The Joint Commenters' members continue to support replacement of the FRC with a FRP and believe it is a needed enhancement to the multi-interval optimization.

However, the Joint Commenters do not support the CAISO's proposal to implement an FRP that is not a biddable product.¹² The Joint Commenters' comments and protests are detailed herein.

A. Flexible Ramping Ancillary Service is Needed and will be a Beneficial Enhancement to the Energy Market

The Commission has acknowledged there is a growing need for ancillary services to support grid function due to changes in the portfolio of generation resources.¹³ The FRP will support grid reliability as the CAISO experiences significant changes in its generation mix.

The additional FRP capacity will increase the reliability and efficiency of the energy market optimization. Currently the FRC only preserves upward capacity and the energy market optimization may dispatch the entire amount of reserved capacity in the first 5-minute interval of

¹⁰ Draft Final Proposal – FRP 2012 (<http://www.caiso.com/Documents/RevisedDraftFinalProposal-FlexibleRampingProduct-2012.pdf>)

¹¹ Exhibit D, Revised Draft Final Proposal FRP, December 17, 2015.

¹² Exhibit C, Direct Testimony of Donald Tretheway, pg. 16.

¹³ Third-Party Provision of Ancillary Services; Accounting and Financial Reporting for New Electric Storage Technologies, Notice of Proposed Rulemaking, FERC Stats. & Regs. ¶ 32,690 (2012) (NOPR). Integration of Variable Energy Resources, Order No. 764, FERC Stats. & Regs. ¶ 32,331, order on reh'g, Order No. 764-A, 141 FERC ¶ 61,232 (2012).

the real-time market run.¹⁴ The ability for the optimization to reserve capacity from 5-minute to 5-minute interval - as well as the addition of headroom on downward capacity - are needed changes. In particular, the ability to preserve ramping headroom in both the upward and downward direction is a needed enhancement to integrate the significant amount of variable energy resources in the market. As California moves toward implementing a 50 percent renewable portfolio by 2030, variable energy resources and behind the meter generation will only add to net load forecast uncertainty.¹⁵ The Joint Commenters support the implementation of an improved FRP.

B. The CAISO has Erred in Failing to Propose a Bid-Based Ramping Product.

The CAISO in its FRP Tariff Amendment does not propose to implement a bid-based ramping product. Rather the CAISO's proposal will require the provision of flexible ramping capacity without giving generators the opportunity to bid to provide this service.¹⁶ Essentially the CAISO has unilaterally determined provision of capability costs to be solely the opportunity cost of providing energy.¹⁷ The CAISO has intentionally chosen to treat the service as if the capacity value of the service has no incremental value. There will also be no opportunity for generators to opt out of providing the product or to express their preference between the

¹⁴ Exhibit D, Testimony of Donald Tretheway pg. 13 - 14.

¹⁵ Department of Market Monitoring 2015 Annual Report, pg. 3
<http://www.caiso.com/Documents/2015AnnualReportonMarketIssuesandPerformance.pdf>

¹⁶ Ibid.

¹⁷ Ibid, page 17 "During the stakeholder process, the CAISO considered if there were any costs in addition to the opportunity cost of providing energy or ancillary services and concluded that there were none."

provision of the product and other ancillary services.¹⁸ Similarly, there will be no opportunity for a supplier to express any pricing preference between a supplier's own resources.¹⁹

While the proposed FRP is a technical improvement to the FRC, the Commission should not approve it as a permanent replacement for the FRC given this deficiency regarding the ability to express a price preference to provide the ramping service. The CAISO's basis for not proposing that the FRP be a bid-based service is that, "...there is no evidence supporting the need for additional compensation."²⁰ The Joint Commenters assert that whether or not a supplier has the need to receive compensation for providing the FRP service, it is not appropriate for the CAISO to unilaterally and comprehensively deny participants the ability to bid the product.

As is discussed in detail below, the FRP is an ancillary service that provides at least as much value to grid reliability as other bid-based ancillary services. The CAISO has not demonstrated why the FRP will not be compensated at an ancillary service-clearing price in the same manner as the other CAISO bid-based ancillary services. The CAISO has not conducted an analysis demonstrating market power associated with providing this product nor provided information that demonstrates that there is a risk to reliability or unfixable efficiency concern by implementing a bid-based product.

¹⁸ Exhibit A, Clean CAISO tariff sheets incorporating this tariff amendment, 44.2.3.

¹⁹ For example, even if a supplier's indifference value of providing the service was close to zero the supplier could bid \$0.01/MW for one of its resources and \$0.02/MW for another of its resources such that all else equal the CAISO would first choose to procure the resource from the resource bid at the lower price.

²⁰ Transmittal letter, pg. 17.

C. The CAISO’s Proposal Errs by Failing to Propose FRP Compensation in the Same Manner as Other Bid-Based Ancillary Services in the CAISO Market

The CAISO’s position on whether the FRP should be bid-based has changed significantly in the past three years. In 2011, the CAISO recognized the importance of creating a new market product with bid-based pricing.²¹ In fact, the CAISO committed that the CAISO would move forward with creating a permanent FRP as an ancillary service,²² and the Commission acknowledged the need for a more robust solution and “strongly encourag[ed] the CAISO to continue its work toward a *bid-based* FRP.”²³ Since then the CAISO has drastically changed its position to the extent it no longer considers the FRP a capacity product or an ancillary service.²⁴

As is detailed below, the FRP is an ancillary service and a substitute for the other bid-based ancillary service products. As described below in sections E. (1) and (2) below, resources providing the bid-based ancillary service capacity would be the same resources providing the FRP capacity, and the FRP capacity would be just as valuable to grid reliability as other ancillary service products.

1. The FRP is an Ancillary Service.

The CAISO proposes explicitly to procure ramping capability beyond that needed to meet the CAISO load forecast in both the fifteen-minute market and the five-minute market. The proposed FRP design has two features, the settlement of forecasted movement and the

²¹ Amendments to California ISO FERC Electric Tariff to Implement the Flexible Ramping Constraint and Provide Related Compensation transmittal letter, p.10, October 7, 2011.

²² CAISO November 14, 2011 Answer at 3-6.

²³ 137 FERC ¶ 61,191, at P 30 (emphasis added).

²⁴ Exhibit D, page 7. (Here the CAISO also mistakenly states that operating reserves are only dispatched through real-time contingency events, which is not true of non-contingent spinning reserves. CAISO tariff, Appendix A).

procurement of additional ramping capacity to account for uncertainty.²⁵ It is this second element, the procurement of additional capacity to account for uncertainty, which the Joint Commenters’ assert qualifies the FRP as an ancillary service. The CAISO will procure additional ramping capability necessary to meet net load even if forecast error materializes in a subsequent market run. They will procure additional ramping capacity up to an exogenously determined “uncertainty requirement.”²⁶

The CAISO notes that uncertainty in the forecast may occur for a variety of reasons, including, “five-minute interval granularity; resources shutting down without sufficient notice; variable energy resources delivering more or less than forecast, including sudden changes in expected deliveries; contingency events; high hydroelectric run-off decreasing resource flexibility; inerties tagging and delivering less than amounts awarded in the hour-ahead scheduling process of the real-time market; and interchange ramp in and out between hours.”²⁷

Absent an FRC or FRP to reserve additional ramping capability, if this uncertainty materializes and the actual upward ramping need is higher than the forecast, the net supply cannot meet the net demand, and a power balance violation may be triggered.²⁸ Additionally, in its FRC filing CAISO warned FERC that forecast uncertainty could cause significant leaning on operational reserves and there was potential for the CAISO to not be able to meet NERC

²⁵ The CAISO will also improve the settlement of ramping capability necessary to meet the changes in forecasted net load between market intervals of the same market run (“forecasted movement”). This aspect of the FRP design is simply a settlements enhancement.

²⁶ Ibid pg. 15 – 16.

²⁷ Transmittal letter, footnote 7.

²⁸ Transmittal letter, pg.7.

operating criteria, be forced to consider load curtailment, and could be subject to compliance action from WECC and/or NERC.²⁹

The FERC glossary defines ancillary services as “[t]hose services necessary to support the transmission of electric power from seller to purchaser, given the obligations of control areas and transmitting utilities within those control areas, to maintain reliable operations of the interconnected transmission system. Ancillary services supplied with generation include load following, reactive power-voltage regulation, system protective services, loss compensation service, system control, load dispatch services, and energy imbalance services.”³⁰

The CAISO defines ancillary services as “Regulation, Spinning Reserve, Non-Spinning Reserve, Voltage Support and Black Start *together with such other interconnected operation services as the CAISO may develop in cooperation with Market Participants to support the transmission of Energy from Generation resources to Loads while maintaining reliable operation of the CAISO Controlled Grid in accordance with WECC standards and Good Utility Practice.*”³¹

In its filing, the CAISO demonstrates that it cannot rely exclusively on the energy scheduled and capacity reserved by the multi-interval market optimization alone to meet net load needs because of the increasing uncertainty in both supply and demand forecasts.³² The CAISO filing further asserts that the FRP is necessary to maintain reliable operation of the grid.³³ Thus, by definition the FRP is an ancillary service.

²⁹ CAISO October 7, 2011 Filing at 4.

³⁰ <http://www.ferc.gov/market-oversight/guide/glossary.asp>

³¹ CAISO Tariff, Appendix A (emphasis added).

³² Transmittal letter, pg. 4.

³³ Transmittal letter, pg. 7.

2. The FRP is a Substitute for the Bid-Based Ancillary Services in the CAISO Market

The FRP is a substitute for other bid-based ancillary services. In its FRC filing, the CAISO stated that it lacked sufficient ramping capability and operating flexibility to an extent that the CAISO system was leaning on regulation capacity and non-contingent operating reserves.³⁴ In its FRP filing the CAISO noted it could rely on additional regulation or spinning reserves, but that this would be economically inefficient.³⁵ Additionally, the CAISO's introduction to their market design proposal describes how insufficient ramping capability causes the grid to lean on regulation services leading to both market inefficiency and potential reliability issues.³⁶ Insufficient procurement of regulation, non-contingent spinning reserves, or additional ramping capability through the FRP may lead to issues with reliability. Therefore, although it is more efficient to procure FRP than to procure additional regulation or operating reserves³⁷, the bid-based ancillary services and the FRP are substitutes for each other from a reliability perspective.

3. The Set of Resources that can Provide the FRP are not Meaningfully Different from the Set of Resources that can Provide CAISO Bid-based Ancillary Services.

The set of resources able to provide ancillary services and able to provide the FRP overlap significantly. In fact, the amount of generating capacity able to provide FRP will be at least equal to, if not greater than, the amount of generating capacity able to provide the ancillary services.

³⁴ CAISO October 7, 2011 Filing at 3.

³⁵ Transmittal letter, pg. 7, Exhibit D pg. 3.

³⁶ Exhibit D, pg. 3.

³⁷ Exhibit D, page 4 – 5 & transmittal letter pg. 7.

In order to provide the CAISO's other ancillary services generators must be certified and tested and meet tariff requirements specifying reaction times and many other conditions.³⁸ In order to provide flexible ramping through the FRP, however, generators only need to satisfy a set of criteria that is significantly less stringent than the CAISO's other ancillary service provision criteria. That is, all resources that have economic bids in the real-time market that can be dispatched on a five-minute basis may provide FRP and be eligible to receive an "Uncertainty Award." The only exceptions to this are resources that have been deemed previously noncompliant, and resources operating within a Forbidden Operating Region or if a Multi-Stage Generating Unit, operating within a transition.³⁹

All resources eligible to provide spinning reserves should be eligible to provide the FRP; however, the reverse is not true, and some resources not able to provide spinning reserves will be able to provide the FRP. Additionally, all the bid-based ancillary services are procured within ancillary service regions and up to eight sub-regions. The FRP requirement will be determined for each BAA and for the EIM Area overall.⁴⁰ Therefore, unlike the bid-based ancillary services, the CAISO only seeks to procure the FRP on a system wide-basis and not sub-regionally.

In short, there are fewer market and structural limitations on the supply of FRP than on the supply of the CAISO's existing ancillary services.

D. The FRP is More Valuable to Grid Reliability Compared to Non-Contingent Spinning Reserves

³⁸ CAISO tariff, section 8 and Appendix K.

³⁹ 44.2.3.1 – 44.2.3.3 of proposed new tariff.

⁴⁰ Transmittal letter pg. 18. It can be noted that since FRP is not a NERC mandated ancillary service product it still could be procured for each BAA and for the EIM Area overall.

The FRP is more valuable to grid reliability than the non-contingent spinning reserve product. Essentially, FRP is an enhanced non-contingent spinning reserve product. Non-contingent spinning reserves are upward ramping capacity that the CAISO dispatches as energy in the real-time market.⁴¹ The flexible ramping product will reserve ramping capacity in both the upward and downward direction and preserve the ramping capability throughout each real-time market run.⁴² Joint Commenters assert that it is unjust and unreasonable for the FRP to be compensated at opportunity cost while spinning reserves are paid an ancillary service-clearing price.

E. The CAISO has not Supported its New Position to Create a Non-Biddable Ancillary Service Product That is Only Procured in the Real-Time Market.

1. The CAISO Proposal Errs in Neglecting to Account for the Incremental Value of the FRP Service – its Capacity Value – and Thus Incorrectly Concludes that Capability Costs are the Sole Opportunity Costs of Providing Energy under the FRP Service

The fact that the CAISO staff has an opinion regarding generator costs is not a sufficient basis to determine that suppliers should not be able to bid for the FRP.

In the transmittal letter, the CAISO states:⁴³

[A]bsent procurement in the day-ahead, there is no need for a separate bid, because there are no costs incurred in the real-time market that need to be recovered through a bid-in price. As the Market Surveillance Committee noted: [T]he costs of providing flexiramp are entirely in the form of the opportunity costs of not selling energy or ancillary services within the CAISO real-time markets. These opportunity costs can be calculated from the resource energy offer and real-time prices and used to determine the real-time price of flexiramp. With the implementation of the flexiramp product, these opportunity costs will be fully captured in the CAISO's co-optimization and pricing models for the [real-

⁴¹ Id. at 3, 9.

⁴² Transmittal letter, page 8.

⁴³ Transmittal letter, page 17.

time] markets.... The CAISO agrees... there is no evidence supporting the need for additional compensation.

Absent a demonstration of market power, it is not up to the CAISO to determine a generator's costs of providing a service or whether there is a need for a certain level of compensation.

During the stakeholder process, WPTF brought up the concern that the provision of the FRP may increase fuel penalty risk given the increased likelihood of changes made to their day-ahead schedule. Other stakeholders also raised the point during stakeholder meetings that generators may want to provide an offer price for the FRP in order to express a preference for the provision of ancillary services over the FRP. These examples illustrate the lack of consensus that there was no need for a separate bid to provide FRP once the FRP was limited to a real-time product.

2. The CAISO's Argument that it would Be Inefficient to Offer Bids for the Proposed Product Is Immaterial and Reveals a Lack of Effort to Comply with Commission Encouragement to Develop a Bid-based product.

As noted in the CAISO's transmittal letter, the "Market Surveillance Committee also explained that with bids in the real-time market, it would be possible that resources offering ramp with a positive bid price not clear, despite their capability being available for dispatch in real time. Then the CAISO would either have to: (1) not count the ramping capability on these resources as available in clearing the market despite the fact that it would actually be available, or (2) count the capability and simply not pay the resources... The CAISO agrees with the Market Surveillance Committee that separate bids for the FRP would create inefficiencies..."⁴⁴

⁴⁴ Transmittal letter, page 17.

The Market Surveillance Committee's (MSC) objection hinges on the premise that resources offering a positive bid price would not clear against the flexible ramping target.⁴⁵ The MSC does not explain how resources with a positive bid price would fail to clear against the flexible ramping target, but simply asserts there is a potential for the resource to fail to clear. Without some credible explanation of how these resources would fail to clear against the flexible ramping target, the Joint Commenters urge the Commission to discount fully this argument. The other concern expressed by the MSC – that the CAISO would simply count available capability towards its ramping needs and not pay the resources for that capability, is precisely the supply community objection that prompted the CAISO to delay implementing the FRC until it had developed a compensation mechanism in the first place. While the CAISO points to these two concerns to justify its proposal to not allow parties to bid to provide FRP in the same manner parties bid to provide every other ancillary service, these concerns, as presented, are without substance.

3. The CAISO Does Not Support its Position to Only Procure the Product in the Real-Time Market.

As noted in the introduction to Section V, in the initial design the CAISO was going to procure the FRP in the day-ahead market.⁴⁶ The FRP should be treated similarly to the other ancillary service products and procured in the day-ahead market. There are more resources available for commitment in the day-ahead market than the real-time market.⁴⁷ It would increase efficiency and lead to increased price and scheduling convergence between the day-ahead and

⁴⁵ Market Surveillance Committee Opinion, Attachment J to the CAISO Tariff Amendment, at page 11.

⁴⁶ Draft Final Proposal – FRP 2012 (<http://www.aiso.com/Documents/RevisedDraftFinalProposal-FlexibleRampingProduct-2012.pdf>)

⁴⁷ Transmittal letter, footnote 2.

real-time markets to procure FRP in the day-ahead market as well as the real-time market. The CAISO's example in the transmittal letter notes that two resources may be able to provide the same amount of capacity over an hour, but not in the 5-minute time-frame.⁴⁸ The CAISO could resolve this deficiency by only awarding a resource the amount of capacity they could provide over 5-minutes. Alternatively, the CAISO could develop an hourly product that the CAISO procures and settles to meet hourly uncertainty; and a fifteen-minute product to resolve a similar deficiency between the differences in ramping capability a resource can provide between the Fifteen Minute Market ("FMM") and five-minute market. The Joint Commenters assert that any inefficiency in day-ahead procurement is not insurmountable and could be resolved through further refinement to the product.

F. The Commission Should Reject the CAISO's Proposal to Procure FRP without Allowing Supplier Bids for the Service.

As indicated above, Joint Commenters support the replacement of the FRC with a FRP and further support many of the characteristics of the CAISO's proposed FRP. For all the reasons provided herein, however, the CAISO's proposal to not allow suppliers to bid to provide FRP is unjust and unreasonable. The CAISO's proposed deprivation of bids comes absent any demonstration on the CAISO's part that the service is not competitive and with all practical considerations suggesting that it the service is amply competitive. Joint Commenters urge the Commission to direct the CAISO to implement the product such that suppliers can express bids for the service irrespective of whether the suppliers are likely to submit \$0/MW bids or non-zero bids.

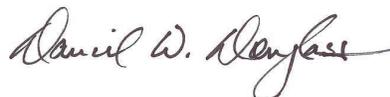
⁴⁸ Ibid, pages 16 – 17.

In the alternative, if the Commission finds it compelling to approve the design as filed for the time being in order to realize the technical benefits of the proposed new FRP, Joint Commenters urge the Commission to require the CAISO to file, within six months, a compliance filing to replace the non-biddable FRP with a biddable FRP within 12 months of the FRP implementation.

V. CONCLUSION

Wherefore, Joint Commenters request that the Commission take the actions detailed herein.

Respectfully submitted,



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July 15, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the *Motion to Intervene and Protest of the Western Power Trading Forum, the Electric Power Supply Association and the Independent Energy Producers Association* on all parties of record in proceeding *ER16-2023-000* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on July 15, 2016, at Calabasas, California.



Michelle Dangott

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