



September 29, 2021

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket No. ER15-2565-____
August 2021 Informational Report
Energy Imbalance Market – Transition Period Report –
Turlock Irrigation District EIM Entity**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its report on the transition period of Turlock Irrigation District EIM Entity during its first six months of participation in the Energy Imbalance Market (EIM) for August 2021. Turlock Irrigation District began participation in the EIM on March 25, 2021 and the transition period ended on August 31, 2021. This is the last and final transition period report for Turlock Irrigation District. The Commission also directed the Department of Market Monitoring (DMM) to submit an independent assessment of the CAISO's report, which the CAISO's DMM will seek to file within approximately 15 business days.

Please contact the undersigned with any questions.

Respectfully submitted

By: /s/ John Anders

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California ISO

**Energy Imbalance Market
August 1 – August 31, 2021**

**Transition Period Report
Turlock Irrigation District (TIDC) EIM Entity**

September 29, 2021

I. Introduction and Background

On October 29, 2015, the Federal Energy Regulatory Commission (Commission) approved the California Independent System Operator Corporation's (CAISO) proposed tariff amendments to allow a transition period for new Energy Imbalance Market (EIM) entities during the first six months of EIM participation, effective November 1, 2015.¹ Turlock Irrigation District (TIDC), the prospective EIM Entity entered the EIM on March 25, 2021, and the transition period will apply to the TIDC balancing authority area (BAA) until August 31, 2021.²

During the six-month transition period, the price of energy in the new EIM entity's BAA is not subject to the pricing parameters that normally apply when the market optimization relaxes a transmission constraint or the power balance constraint. Instead, during the six-month transition period, the CAISO will clear the market based on the marginal economic energy bid (referred to herein as "transition period pricing"). In addition, during the six-month transition period, the CAISO sets the flexible ramping constraint relaxation parameter for the new EIM entity's BAA between \$0 and \$0.01, but only when the power balance or transmission constraints are relaxed in the relevant EIM BAA. This is necessary to allow the market software to determine the marginal energy bid price.

Consistent with the Commission's October 29 Order, the CAISO and the Department of Market Monitoring (DMM) will file informational reports at 30-day intervals during the six-month transition period for any new EIM entity. The CAISO provides this report for TIDC to comply with the Commission's requirements in the October 29 Order. The CAISO anticipates filing these reports on a monthly basis. However, because the complete set of data is not available immediately at the end of the applicable month,³ and depending on the market performance each month, along with the need to coordinate with the EIM entity, the CAISO expects to continue to file the monthly reports approximately 25 days after the end of each month in order to provide the prior full month's data.

¹ *California Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,104 (2015) (October 29 Order).

² This follows from the application of CAISO Tariff section 27(b)(1), which refers to a number of months rather than a number of days.

³ The earliest the CAISO can start gathering the data is 10 business days after the last day for the reporting month since this is when the price correction window expires.

II. Highlights

Overall, TIDC's market operation in the sixth month of the transition period was smooth and without significant consequence. The sixth month's market performance highlights are as follows:

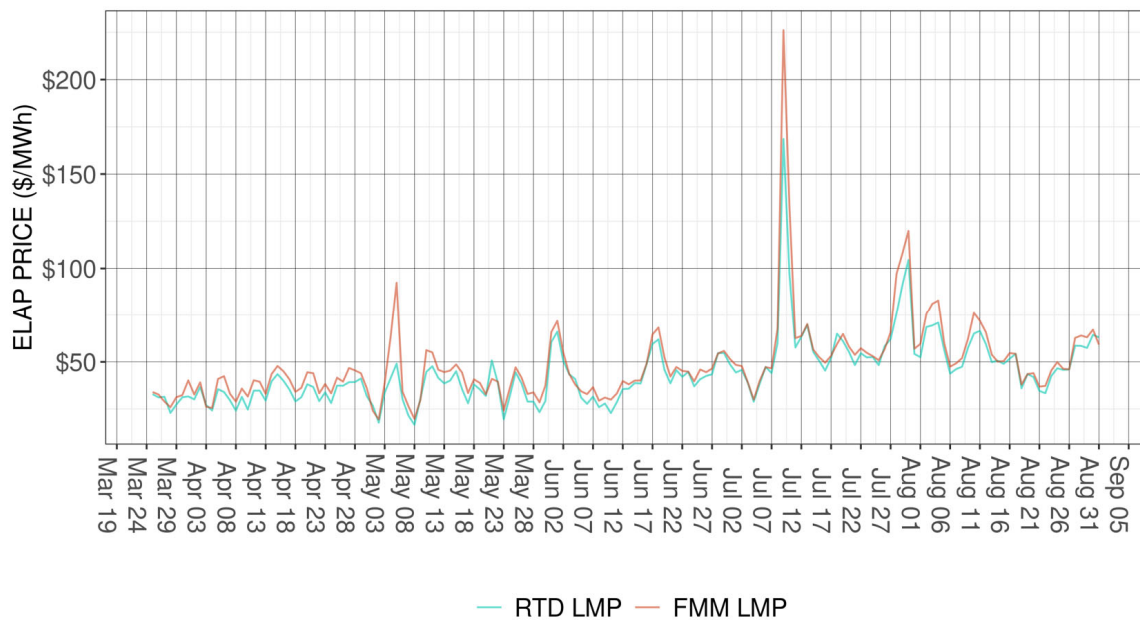
- Prices have been stable and within reasonable ranges, with a monthly average price of \$56.48/MWh in the fifteen-minute market (FMM) and \$52.63/MWh in the real-time dispatch (RTD).
- Power balance constraint infeasibilities for under-supply conditions were minimal for the TIDC BAA with no infeasibilities in the fifteen-minute market and no under-supply infeasibility in the five-minute market.
- As part of the resource sufficiency test performed for each EIM entity prior to the real-time markets, TIDC successfully passed over 99.33 percent of its balancing tests and 98.68 percent of its bid-range capacity tests.
- Also as part of the resource sufficiency test, TIDC passed successfully all of the upward flexible ramping sufficiency tests and 99.97% of the downward flexible ramp sufficiency test.
- The price for upward flexible ramping capacity in the FMM for the TIDC BAA averaged at \$0.122/MWh in August, while the average price for the downward flexible ramping product was \$0.026/MWh.

III. Market Performance Related to the Transitional Period

a. Prices

Figure 1 shows the daily average Fifteen-Minute Market (FMM) and Real-Time Dispatch (RTD) prices in the TIDC EIM Load Aggregation Point (ELAP) for March 25, 2021 through August 31, 2021. The monthly average price for August in FMM was \$56.48/MWh and \$52.63/MWh in the RTD.

Figure 1: Daily average prices for the TIDC BAA



Under the CAISO’s price correction authority in Section 35 of the CAISO tariff, the CAISO may correct prices posted on its Open Access Same-Time Information System (OASIS) if it finds: (1) that the prices were the product of an invalid market solution; (2) the market solution produced an invalid price due to data input failures, hardware or software failures; or (3) a result that is inconsistent with the CAISO tariff. The prices presented in Figure 1 include all prices produced by the CAISO consistent with its tariff requirements. That is, the trends represent: (1) prices as produced in the market that the CAISO deemed valid; (2) prices that the CAISO could, and did, correct pursuant to Section 35 of the CAISO tariff; and (3) any prices the CAISO adjusted pursuant to the transition period pricing reflected in Section 29.27 of the CAISO tariff.

b. Frequency of Power Balance Constraint Infeasibilities

Figures 2 and 3 show the frequency of intervals in which the power balance constraint was relaxed for under-supply conditions in the TIDC BAA for the FMM and the RTD, respectively. The under-supply infeasibilities are classified into three categories: Valid, Corrected and Would-Be-Corrected. Some of the under-supply infeasibilities affected by either data input failures or software failures were corrected under the price correction authority in Section 35 of the CAISO tariff are classified as Corrected. There are other under-supply infeasibilities that were impacted by data input failures or software failures, and which would be subject to price correction, but were not corrected because the price after correction would be the same price as that obtained by the transition period pricing. These instances are classified as Would-be-Corrected. All remaining under-supply infeasibilities driven by system conditions are classified as Valid.

Figure 2: Frequency of FMM under-supply infeasibilities in the TIDC BAA

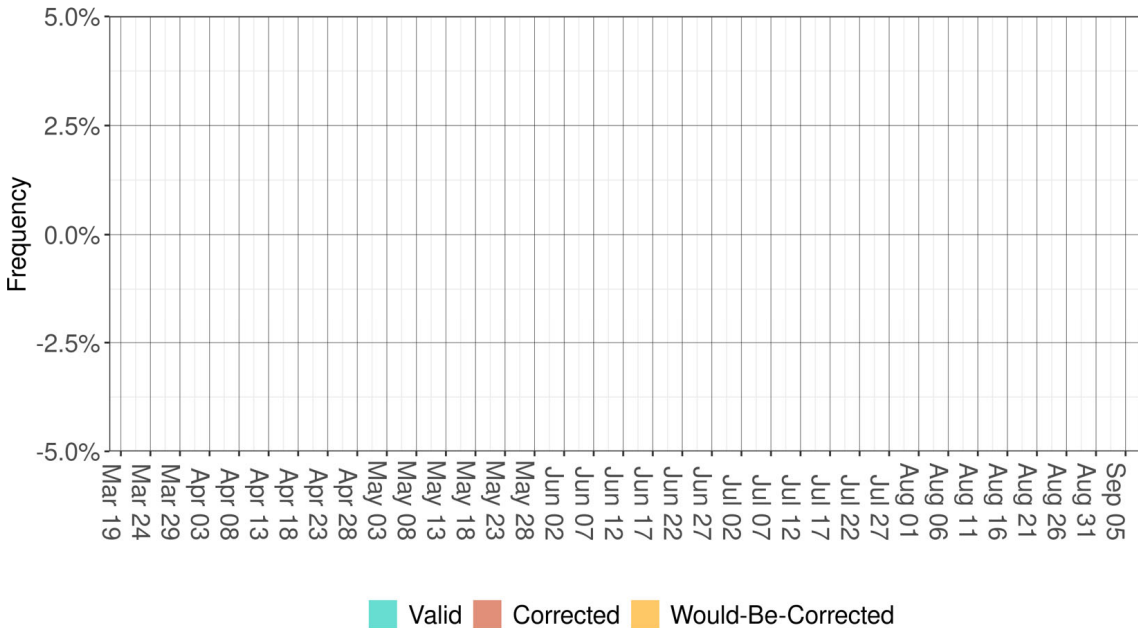
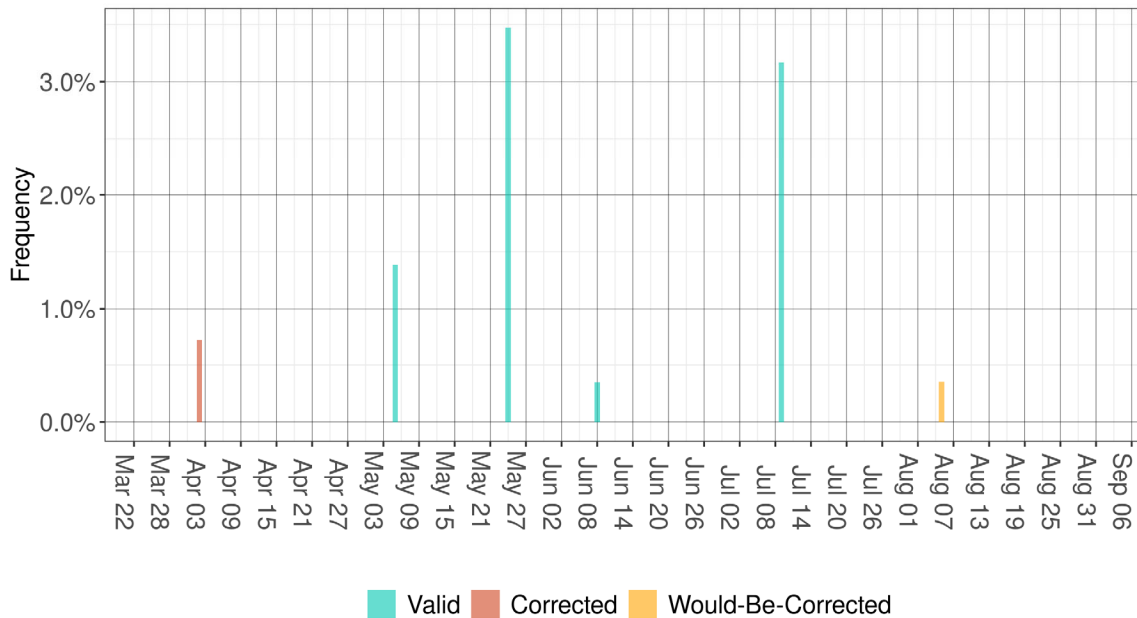


Figure 3: Frequency of RTD under-supply infeasibilities in the TIDC BAA



Tables 1 and 2 list the valid FMM and RTD intervals with under-supply infeasibilities observed in August, including the amount of load conformance. There were no valid under-supply power balance infeasibilities in FMM and one interval in RTD with under-supply infeasibilities between August 1, 2021, and August 31, 2021. The interval with under-supply infeasibility for TIDC BAA was in hour ending 7 on August 5, 2021. On this day, the market experienced disruption and had incorrect resource initial condition after it came back from disruption. Therefore, the result of this RTD run was not used for settlement purpose. This under-supply infeasibility is shown as Would-Be-Corrected in Figure 3, because administrative prices were used for this five-minute interval.

Table 1: List of valid FMM under-supply infeasibilities in the TIDC balancing authority area

Trade Date	Trade Hour	Trade Interval	MW Infeasibility	Load Conformance

Table 2: List of valid RTD under-supply infeasibilities in the TIDC balancing authority area

Trade Date	Trade Hour	Trade Interval	MW Infeasibility	Load Conformance

c. **Balancing and Sufficiency Test Failures**

The EIM provides an opportunity to various BAAs to serve its load while realizing the benefits of increased resource diversity. Since the EIM does not include resource adequacy requirements or obligations for resources to submit bids, the CAISO performs a series of resource sufficiency tests comprised of: (i) a balancing test; (ii) a capacity test; and (iii) a flexible ramping sufficiency test. These tests occur prior to the real-time market.

Performance of a balancing test before each trading hour ensures that each participating BAA submits a balanced base schedule of generation and a net schedule interchange to meet its demand. In addition, the participating BAA is required to submit bids with enough ramping capability to meet its net load forecast uncertainty and load movement requirements. Figure 4 shows the trend of balancing test outcomes for the period of March 25, 2021, through August 31, 2021, and Figure 5 shows the pattern of bid-range capacity test outcomes for the period of March 25, 2021, through August 31, 2021.⁴ If a balancing test or the bid-range capacity test is affected by data input failures or software failures, those test results are shown as correctable events. The TIDC BAA passed the balancing test in 99.33 percent of the intervals in August, which is within the acceptable range of balancing test failures. All balancing test failures in August were due to imbalanced submittal from the system application that runs the resource tests.

The TIDC BAA passed the bid-range up capacity test in 98.89 percent of intervals in August and passed the bid-range down capacity test in 99.8 percent of intervals in August. The TIDC failed the bid range up capacity test on August 4 in hour ending 20 due to lack of sufficient upward bid range. For similar reason, the bid range up capacity test failures on August 1, 9, 11, 13, 16 was due to insufficient bid range with relative large upward requirement.

⁴ The CAISO performs resource sufficiency tests pursuant to Section 29.34(k) of the CAISO tariff.

Figure 4: Frequency of Balancing test failures in the TIDC BAA

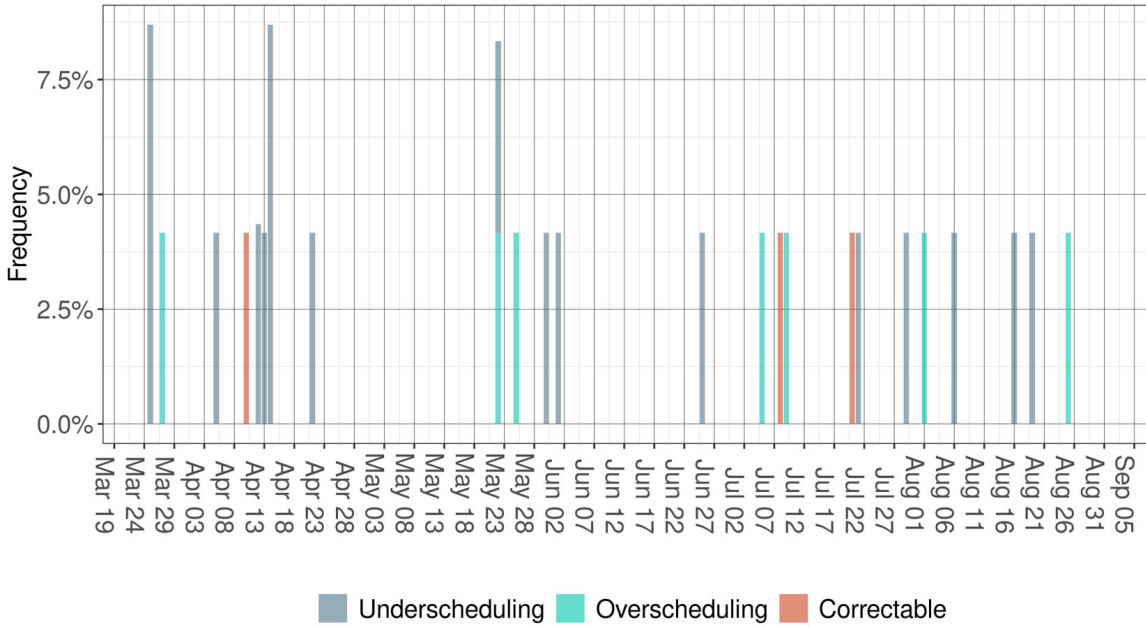
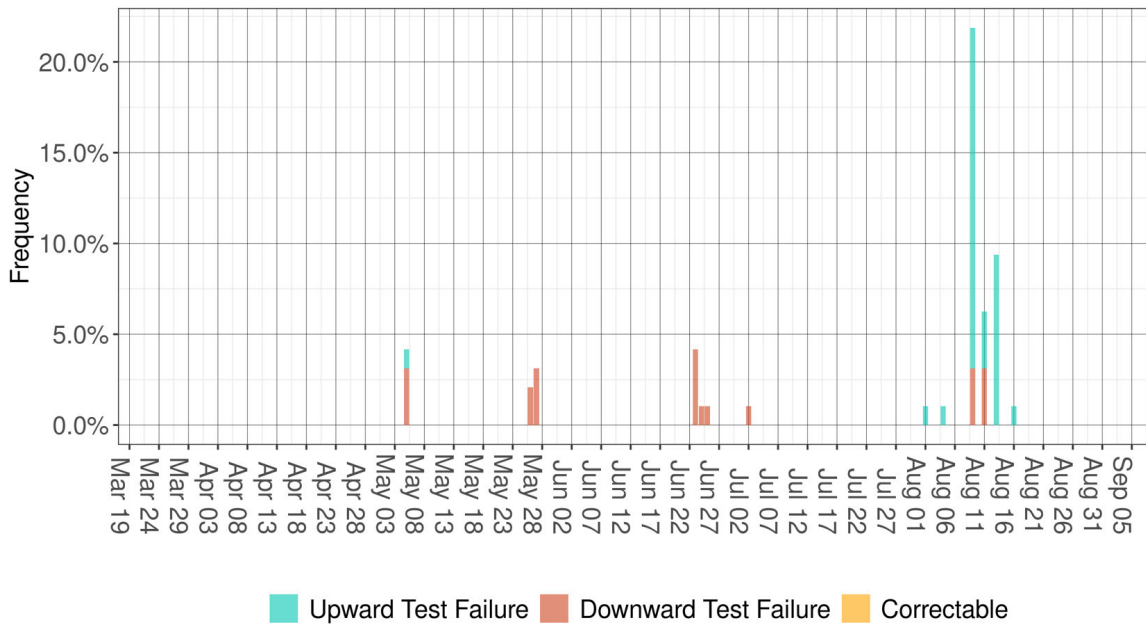


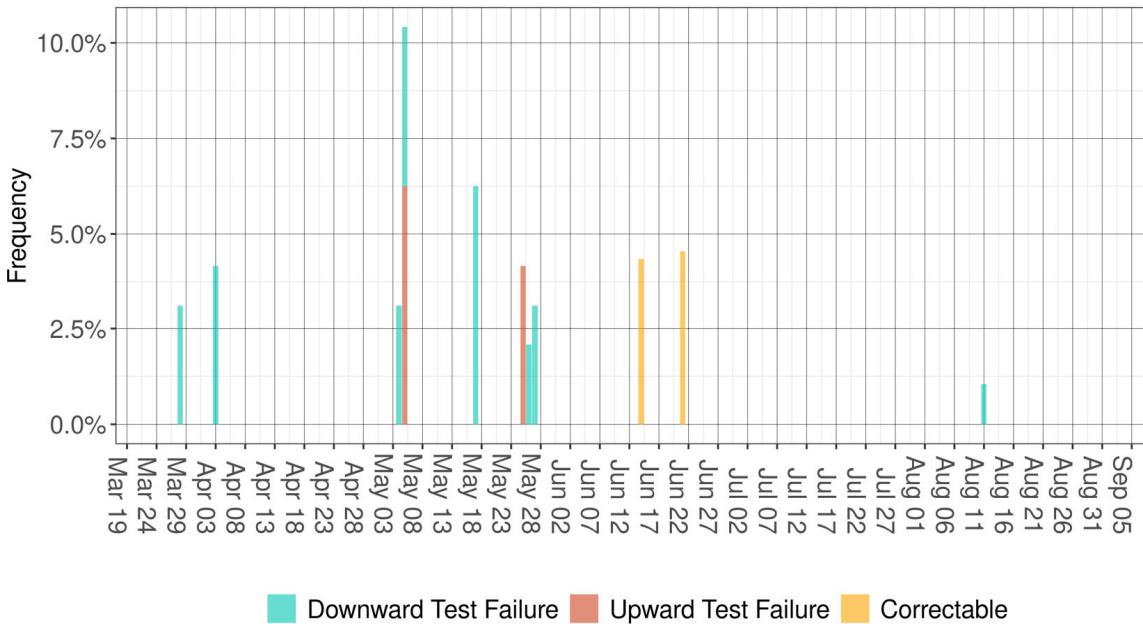
Figure 5: Frequency of Bid Range Capacity test failures in the TIDC BAA



The CAISO also performs the flexible ramping sufficiency test as specified in Section 29.34(m) of the CAISO tariff. Figure 6 shows the trend of the test failures for flexible ramping for the period of March 25th through August 31st. The TIDC BAA passed the flexible ramp down test in 99.97% of the intervals and

flexible ramp up test in all the intervals in August. The flexible ramp down test failure on August 11 was due to the lack of online participating resource in hour ending 10.

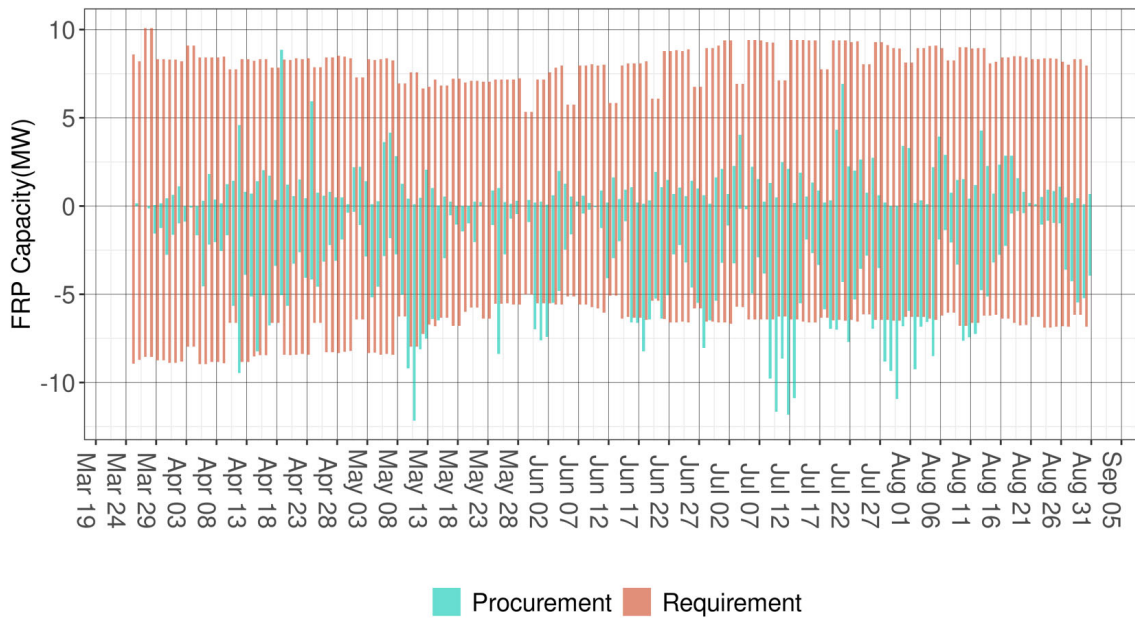
Figure 6: Frequency of flexible ramping sufficiency test failures in the TIDC BAA



d. Flexible Ramping Product

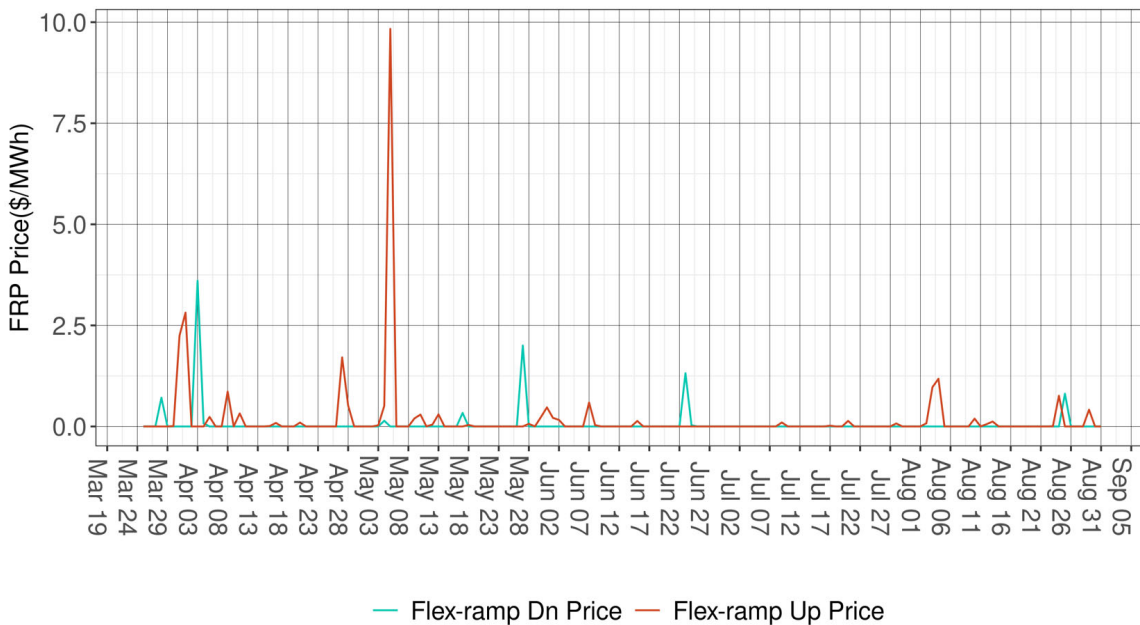
Figure 7 shows the daily average of the upward and downward flexible ramping constraint requirement and procurement in the FMM. Figure 8 shows the daily average of the upward and downward flexible ramping constraint prices in the FMM. With the implementation of the flexible ramping product on November 1, 2016, calculation of the requirements consists of historical data for uncertainty with any applicable net import/export capability or credit. This effectively reduces the amount of flexible ramping the TIDC BAA has to procure and, generally, the EIM system-wide area (which includes all the BAAs in the EIM, including the CAISO BAA) will drive the requirements. The market clearing process may result in procuring the TIDC BAA capacity towards meeting the overall EIM-system-wide area requirement. This is the main reason why the individual TIDC procurement may generally fall below or be above the individual TIDC flex ramp requirement. For most of the time, the flexible ramping up procurement was below the area requirements whereas, the flexible ramp down procurement was above the area requirements.

Figure 7: Daily Average requirement and procurement of upward and downward flexible ramping in the FMM for the TIDC BAA



The price trend provided in Figure 8 is the nested price determined by the summation of the shadow price of the individual TIDC BAA plus the shadow price of the EIM system-wide area. Between August 1, 2021 and August 31, 2021, the average FMM upward flexible ramping capacity price was \$0.122/MWh and the average downward flexible ramping capacity price was \$0.026/MWh.

Figure 8: Daily Average flexible ramping up and down price in FMM for the TIDC BAA



CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 29th day of September 2021.

/s/ Anna Pascuzzo
Anna Pascuzzo