

**Comments of Powerex Corp. on  
Transmission Service and Market Scheduling Priorities – Phase 2  
Revised Draft Tariff Language**

<b>Submitted by</b>	<b>Company</b>	<b>Date Submitted</b>
Amy Sopinka 604.891.5096	Powerex Corp.	June 27, 2023

Powerex submits the following comments on the CAISO’s June 14, 2023, Transmission Service and Market Scheduling Priorities Phase 2 Revised Draft Tariff Language (“Revised Draft Tariff”). Powerex is seeking clarity regarding how existing transmission contracts can be used to establish Wheeling Through Priority across the CAISO system, particularly with respect to TORs that are released to the CAISO in exchange for option congestion revenue rights (CRRs).

The Final Proposal describes that one option for market participants to establish a Wheeling Through Priority is “...to seek to contract with holders of legacy transmission contracts to support wheel through transactions across the ISO system given there is 1200 MW of capacity tied up under legacy agreements that must be respected.”<sup>1</sup>

Powerex owns long-term firm PacifiCorp OATT rights from Malin to Round Mountain that are considered Transmission Ownership Rights (TORs). As TORs, these rights are treated as Existing Transmission Contracts (ETCs) that are deducted from the available ATC to support CAISO imports at the Malin intertie. However, as part of a FERC-approved settlement agreement, PacifiCorp customers with rights from Malin to Round Mountain can elect to release their TOR capacity to the CAISO in exchange for receiving option CRRs. Such an election supports increased market efficiency by allowing the CAISO to increase the ATC at the Malin intertie for market use, while providing the customer that releases those rights with congestion revenues across that path.

Powerex requests that the CAISO confirm and clarify in the Revised Draft Tariff the approach to ensure that TOR rights that are released to the CAISO in exchange for option CRRs can be used to support a Wheeling Through Priority. Specifically, Powerex seeks to confirm that:

1. A market participant that holds TORs from a CAISO intertie (e.g., Malin) can request a Wheeling Through Priority directly from that CAISO intertie to any CAISO Export Scheduling Point.
2. CAISO will credit the TOR capacity at the relevant CAISO intertie (e.g., Malin) towards the Wheeling Through Priority request (hence reducing the import ATC that must be reserved to support the Wheeling Through Priority request by the quantity of supporting TORs).

---

<sup>1</sup> Final Proposal at 26.

3. The market participant that requests a Wheeling Through Priority directly from the CAISO intertie (e.g., Malin) using its TOR capacity will also release those rights to the CAISO in exchange for receiving option congestion revenue rights (like today).
4. Provided that the market participant releases its TOR capacity supporting the Wheeling Through Priority request, it can register and schedule its Priority Wheel Resource ID directly from the CAISO intertie (e.g., Malin) to the requested CAISO Export Scheduling Point.