

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

Submitted by	Company	Date Submitted
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Powerex submits the following comments on the CAISO’s March 27, 2023, Transmission Service and Market Scheduling Priorities Phase 2 Draft Tariff Language (“Draft Tariff”). Powerex’s prior comments explain its view that the CAISO’s policy in this initiative is contrary to open access principles and operates as a barrier to competitive wholesale markets.¹ Powerex’s present comments focus solely on potential gaps between the Final Proposal and the Draft Tariff.

The Draft Tariff contains provisions governing the submission and processing of requests for Wheeling Through priority on a monthly (Section 23.4) and a daily (Section 23.5) basis.² These provisions appear to apply to requests for Wheeling Through priority supported by an allocation by CAISO of ATC.³

The Draft Tariff does not appear to address certain elements of the Final Proposal that were reviewed by and approved at the February 1, 2023, Joint Session of the CAISO Board of Governors and the WEIM Governing Body. In particular, to address concerns that ATC to support Wheeling Through priority is likely to be very limited or completely unavailable during certain summer months, the Final Proposal explains that entities will also have:

additional options to establishing priority across the ISO system, whether it is acquiring ATC through the ISO processes or working with parties holding **existing transmission contracts to establish wheeling through priority** across the system.⁴

The Final Proposal further describes in detail two mechanisms that will be available for market participants to use existing transmission contracts to establish Wheeling Through priority:

¹ Powerex’s comments on the Draft Final Proposal are available [here](#).

² Provisions for obtaining priority Wheeling Through priority on a long-term basis (Section 23.6) appear to be contemplated but have not yet been proposed by CAISO.

³ See, e.g., Section 23.4 (“Scheduling Coordinators can request a monthly Wheeling Through priority for any month(s) ATC is calculated and available[.]”; “The CAISO will award ATC to support Priority Wheeling Through requests...”; “...priority requests ... will be awarded ATC...”). Similar language appears in Section 23.5 for daily requests.

⁴ Final Proposal at 26, emphasis added.

1. "...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."⁵
2. "... instances where legacy transmission contract holders **release some of their rights to the market in return for CRRs**, and this is done generally on a quarterly basis. This can **create additional ATC** typically 3-4 months out[.]"⁶

Powerex requests that the CAISO include the provisions for supporting Wheeling Through priority with existing transmission contracts in a revised version of the Draft Tariff.

⁵ Final Proposal at 57, emphasis added.

⁶ *Id.*, emphasis added.