

Silicon Valley Power (SVP) appreciates the opportunity to provide comments to the CAISO on its February 8, 2018 Congestion Revenue Rights Auction Efficiency – Track 1 Draft Final Proposal document. Our apologies if there was a specific comments template to use – we didn't see one on the CAISO website. SVP's comments are as follows:

Although the CAISO's proposed Track 0 and Track 1 modifications to the current process have some merit, these proposals miss the mark by merely addressing symptoms without addressing the fundamental defects of the CRR Auction design issues. SVP recommends that the CRR auction move to a market structure that supports willing buyers and sellers as soon as possible so that it would be operational for the 2019 CRR annual process. If the CRR auction market is restructured to support this change, then such incremental changes as proposed in Track 1 would no longer be necessary.

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