



Submit comment on straw proposal and May 25-26 meeting discussion

Initiative: Extended day-ahead market

1. EDAM VOLUNTARY MODEL: Please provide your organization's comments on the proposed structure of the EDAM voluntary participation model as described in section II.A.1 of the EDAM straw proposal.

The Council reserves comment.

2. EDAM FEES: Please provide your organization's comments on the proposed framework of the EDAM fee structure as described in section II.A.2 of the EDAM straw proposal.

The Council reserves comment.

3. CONFIDENCE IN MARKET TRANSFERS: Please provide your organization's comments on the concept of market transfers (occurring through the EDAM and WEIM) having equal priority to load to the extent an individual EDAM BAA faces severe emergency conditions as discussed in section II.A.3 of the EDAM straw proposal.

The Council reserves comment.

4. CONFIDENCE IN MARKET TRANSFERS: Please provide your organization's comments on whether the failure of the day ahead resource sufficiency evaluation should have a bearing on the level of priority afforded to market transfers (EDAM and WEIM) sourcing from an EDAM BAA facing emergency conditions and sinking in the EDAM BAA that failed the resource sufficiency evaluation.

The Council reserves comment.

5. CONFIDENCE IN MARKET TRANSFERS: Please provide any additional comments on the topic of confidence in market transfers (occurring through the EDAM and WEIM).

The Council reserves comment.

6. TRANSMISSION COMMITMENT: Please provide your organization's comments on the overall framework of transmission buckets in the context of making transmission available to the EDAM as described in section II.B.1 of the EDAM straw proposal.

The Council reserves comment.

7. TRANSMISSION COMMITMENT: Please provide your organization's perspective on Bucket 2 transmission and whether it should be made available to the EDAM only through a

voluntary framework or through a more general rule that transmission unscheduled by 10am of the day ahead is automatically made available to the EDAM for optimization as described in the straw proposal.

The Council reserves comment.

8. TRANSMISSION COMMITMENT: Please provide your organization's perspective on the compensation options for bucket 3 transmission described in the EDAM straw proposal.

The Council reserves comment.

9. TRANSMISSION COMMITMENT: Please provide your organization's comments on the concept of Bucket 3 transmission costs being recovered outside of the market optimization, should the ISO through the EDAM process work toward a design for transmission revenue recovery, based on one of the options described (3A, 3B, 3C), in order to keep the EDAM entity whole as a result of EDAM participation.

The Council reserves comment.

10. TRANSMISSION COMMITMENT: Please provide your organization's comments on any other aspects of the transmission commitment in EDAM topic.

The Council reserves comment.

11. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the process for conducting the EDAM RSE as described in section II.B.2 of the EDAM straw proposal.

The Council reserves comment.

12. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the proposed treatment of WSPP Schedule C and like firm energy contracts within the EDAM RSE.

The Council reserves comment.

13. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's perspective on the ISO proposal, and associated reliance, on day ahead intertie bids (not associated with resource adequacy).

The Council reserves comment.

14. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the treatment of demand response and its different types and functions for purposes of passing the RSE.

The Council supports the Straw Proposal's proposed treatment of EDAM Entities' load modification and demand response (collectively, "DR") in the RSE. For the sake of clarity, the Council adopts the term of "non-participating DR" used by the CAISO in its Proposed Revision Request (PRR) 1438 for DR that does not conform with the CAISO's Proxy Demand Resource (PDR) and Reliability Demand Response Resource (RDRR) products.

It is logical to require that any reduction of the demand forecast on account of non-participating DR should be contingent on a commitment to dispatch the DR during the associated time period in the real-time market. In addition, the CAISO should also consider adapting its PDR and/or RDRR products for EDAM Entities in the future to incentivize them to show these resources to meet their respective RSEs.

15. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the proposed EDAM RSE failure consequences approach under which transfers would be allowed under an RSE failure at a penalty price.

The Council reserves comment.

16. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the proposed EDAM RSE failure consequences approach which distinguishes the consequences depending upon whether the failure occurred under "normal conditions" as compared to "stressed system conditions."

The Council reserves comment.

17. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on the concept of a pooled WEIM RSE for entities passing the EDAM RSE, as described in the straw proposal and stakeholder meeting.

The Council reserves comment.

18. DAY-AHEAD RESOURCE SUFFICIENCY EVALUATION (RSE): Please provide your organization's comments on any other elements of the EDAM RSE not raised by the questions above.

The Council reserves comment.

19. INTEGRATED FORWARD MARKET (IFM) AND RESIDUAL UNIT COMMITMENT (RUC): Please provide your organization's comments on considerations related to the IFM and RUC as part of EDAM.

The Council reserves comment.

20. INTEGRATED FORWARD MARKET (IFM) AND RESIDUAL UNIT COMMITMENT (RUC): Please provide your organization's comments on the role of the imbalance reserve market product, currently being developed in the Day-Ahead Market Enhancements initiative, in the EDAM.

The Council reserves comment.

21. MARKET POWER MITIGATION (MPM): Please provide your organization's comments on the proposal to extend the WEIM market power mitigation framework to the EDAM and the further evaluation of potential market power mitigation enhancements within the Price Formation Enhancements initiative.

The Council reserves comment.

22. CONVERGENCE BIDDING: Please provide your organization's comments on the proposal for a transition period under which convergence bidding is only a market feature in the ISO BAA and not available in other EDAM BAAs at the onset of the EDAM.

The Council reserves comment.

23. CONVERGENCE BIDDING: Please include any additional comments on the topic of convergence bidding within EDAM.

The Council reserves comment.

24. EXTERNAL RESOURCE PARTICIPATION: Please provide your organization's comments on the ISO initial leaning toward extending the WEIM framework of external resource participation to the EDAM.

The Council reserves comment.

25. EXTERNAL RESOURCE PARTICIPATION: Please include any additional comments on the topic of external resource ability to participate in the EDAM.

As the Council stated above, the CAISO should seek to develop versions of PDRs and RDRRs to which EDAM Entities can conform their own DR programs and resources while preserving the option for non-participating DR to reduce the demand forecast as part of the RSE. Market-integrated DR products will provide an avenue for EDAM Entities to earn energy market revenues while providing additional resources that the CAISO can further leverage to realize the benefits of greater regional integration.

26. GREENHOUSE GAS ACCOUNTING: Please provide your organization's overall comments, including potential suggested enhancements, on the resource specific approach to GHG accounting as described in section II.E of the EDAM straw proposal.

The Council reserves comment.

27. GREENHOUSE GAS ACCOUNTING: Please provide your organization's feedback on the resource specific's approach use of the RSE solution as the counterfactual for measuring secondary dispatch.

The Council reserves comment.

28. GREENHOUSE GAS ACCOUNTING: Please provide your organization's feedback on the resource specific approach's measures to limit secondary dispatch.

The Council reserves comment.

29. GREENHOUSE GAS ACCOUNTING: Please provide your organization's overall comments, including potential suggested enhancements, on the zonal approach to GHG accounting as described in section II.E of the EDAM straw proposal.

The Council reserves comment.

30. GREENHOUSE GAS ACCOUNTING: Please provide your organization's feedback on the design of the hurdle rate for the zonal approach.

The Council reserves comment.

31. GREENHOUSE GAS ACCOUNTING: Please provide your organization's feedback on the treatment of resources outside the GHG regulation area as internal to a GHG regulation area on a long-term or short-term basis, using the GHG pseudo tie functionality, in the zonal approach.

The Council reserves comment.

32. GREENHOUSE GAS ACCOUNTING: Please provide any additional comments on the GHG topic that were not captured by the questions above.

The Council reserves comment.

33. TRANSFER REVENUE ALLOCATION: Please provide your organization's comments on the proposed transfer revenue allocation approach as described in section II.D.1 of the straw proposal and any other aspects of the transfer revenue allocation discussion topic.

The Council reserves comment.

34. SETTLEMENTS: Please provide your organization's comments on settlements aspects of the EDAM described thus far, recognizing these will develop as the design evolves, as discussed in section II.D.2 of the EDAM straw proposal.

The Council reserves comment.

35. EDAM TECHNICAL WORKSHOPS: Please provide your organization's comments on the upcoming EDAM technical workshops. Which key components of the straw proposal should be further discussed in EDAM technical workshops.

The Council reserves comment.

36. GENERAL COMMENTS: Please provide your organization's comments on any other elements or aspects of the EDAM straw proposal.

The Council reserves comment.