Submit comment on 1/21 Call

Initiative: Day-ahead sufficiency

1. Please provide a summary of your organization's comments on the Day-Ahead Sufficiency Draft Final Proposal and January 21, 2025 stakeholder meeting. *

The California Efficiency + Demand Management Council (Council) appreciates this opportunity to comment on the Day-Ahead Sufficiency Draft Final Proposal. We continue to support the elements of the proposal addressed below with one exception. In order to improve the CAISO's visibility of investor-owned utility (IOU) demand response (DR) programs, which are not shown on load-serving entity (LSE) supply plans, the Council recommends that the CAISO establish a 9:00 a.m. bidding deadline into the Integrated Forward Market (IFM) for any Proxy Demand Resources (PDR) that are credited against LSE Resource Adequacy (RA) requirements. This will ensure an accurate account of the contribution of these resources to the advisory Resource Sufficiency Evaluation (RSE) can be made and mitigate the risk they would otherwise create of failing the binding RSE.

2. Please provide your organization's comments on the CAISO Balancing Authority (BA) processes for estimating supply available to meet its day-ahead resource sufficiency evaluation (RSE) obligation. *

The Draft Final Proposal indicates that, because the IOUs' DR programs are not shown on supply plans, the CAISO would only count them in the 9:00 a.m. advisory RSE to the extent that they are bid into the IFM by 9:00 a.m. The Council believes that the CAISO should have as much visibility as possible of the resources in its market, including to accurately assess its risk of failing the RSE. To that end, the CAISO should establish a 9:00 a.m. bidding deadline for any PDRs that receive RA credit in lieu of being shown on supply plans. This would eliminate the uncertainty surrounding the quantity of the IOUs' available DR resources on any given day which, in turn, will improve reliability and ensure California ratepayers are not saddled with financial penalties for failing the RSE.

3. Please provide your organization's comments on the proposed method of accounting for Reliability Demand Response Resources (RDRR) in the day-ahead time frame. *

The Council continues to support the CAISO's proposed approach for accounting for RDRRs in the RSE and, when applicable, to the Reliability Unit Commitment process. The Council also thanks the CAISO for confirming its intent to honor the use limitations of RDRRs.

4. Please provide your organization's comments on the proposed method for accounting for Strategic Reliability Reserve (SRR) resources. *

The Council reserves comment.

5. Please provide your organization's comments on the proposed monitoring at EDAM launch to determine whether additional incentives for tagging cleared day-ahead imports should be developed. *

The Council reserves comment.

6. Please provide any additional comments not covered by the questions above. *

N/A