



## Submit comment on Revised draft tariff language

Initiative: Extended day-ahead market

### 1. Please provide any redline changes and embedded comments your organization may have on the Extended Day-Ahead Market revised draft tariff language as an attachment to this comment template, and provide any additional comments in the text box below: \* \*

When providing additional comments in the text box below, please specify the section(s) or subsection(s) your comments refer to.

Western Resource Advocates and Sustainable FERC Project (Public Interest Organizations “PIOs”) appreciate the opportunity to comment on the Extended Day-Ahead Market (EDAM) Revised Draft Tariff Language. The PIOs support the development of a successful, well-designed EDAM that maximizes efficiency, reduces greenhouse gas emissions, and lowers costs. In accordance to these goals, our comments focus on certain transmission elements that can maximize both participation in, and the efficiency of, the market.

**Section 33.1.1.1** - PIOs request clarification of the definition of “manual operation” that an EDAM Entity would undertake of its BAA in the event the CAISO issues a Market Notice of temporary suspension of EDAM participation by an EDAM Entity.

**Section 33.2.1** - PIOs request that CAISO require EDAM Entity Implementation Agreements to be made available in the tariff or provide further clarification on the reason for not requiring it. EDAM Entity Implementation Agreements are important as they provide relevant and crucial information on seams. While there isn’t a requirement in the tariff for the CAISO to publish the EIM Implementation Agreements, the EDAM is not just an extension of the EIM, it is a full day-ahead market, and its tariff requirements should not be based on the EIM.

**Section 33.4 (d)** - PIOs request clarification on the definition of “CAISO Controlled Grid” to ensure alignment with the definition of “CAISO Controlled Grid” under different conditions within the Joint Authority framework.

**Section 33.18.2.2** - CAISO has included a path forward that enables transmission customers of transmission service providers that have transmission rights across an EDAM BAA to have their transmission used to support Resource Sufficiency. PIOs appreciate how CAISO has proactively worked with key stakeholders to find modifications to this specific tariff language that addresses this issue. Allowing the use of these transmission rights for Resource Sufficiency under Bucket 2 will improve the efficiency of the market while reducing barriers to participation for entities that have contracted with off-system generators in another EDAM BAA. While we are greatly appreciative of the significant progress that has been made on this issue, we suggest CAISO consider implementing economic bidding (rather than self-scheduling) for the use of this transmission to maximize efficiencies in the market.

**Section 33.23** - Per our previous comments, the PIOs support further discussions on Section 33.23 of the Revised Tariff Language. We believe the use of an hourly transmission charge would bring

significant efficiency benefits to participants in the market. We also support exploration of alternative language, including the optionality for the use of a *non-firm hourly* transmission charge, that would be workable for both CAISO and transmission providers to achieve this outcome.

**Section 33.29** - PIOs request further explanation of the operational linkages between the EDAM and the EIM in the EDAM Business Practice Manual.

**Section 33.31.4** - PIOs request that the Demand Forecast and Variable Energy Resource Forecast for each EDAM Entity is given to the Department for Market Monitoring (DMM) and that the information is reflected in regular DMM reports and presentations for regulators and stakeholders.

**Section 33.32.6.2** - PIOs request clarification on what would be considered “confidential” about information related to GHG Transfers that would prevent the information from being disclosed. We support the disclosure of information related to GHG Transfers as an important component to the West-Wide GHG Reporting Initiative led by the Clean Energy Buyers Institute (CEBI), WRA, GridLab, and Gridworks and supported by the Sustainable FERC Project.

In addition to these recommendations and requests, the PIOs reiterate our suggestion for CAISO to include as much detail as possible in the Tariff. Including the Final EDAM Proposal’s key policy provisions in the Tariff language minimizes concerns over how EDAM entities might implement these policies and ensures consistency in treatment across BAAs. Additionally, PIOs continue to broadly support EDAM, with the hope that the transmission provision proposal will lead market participants on a glide-path to an RTO in the West. We believe a flow-based transmission framework that enables transparent use and allocation, maximizes efficiency, and ensures fairness in compensation will result in significant benefits for participants across the footprint while integrating the maximum amount of clean energy generation.