

California Community Choice Association

SUBMITTED 03/16/2022, 03:42 PM

Contact

Shawn-Dai Linderman (shawndai@cal-cca.org)

1. Please provide your organization's comments on the imbalance reserve demand curve topic:

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the Day-Ahead Market Enhancements (DAME) Workshop held on March 2, 2022. CalCCA's comments focus on the proposals' impact on the Resource Adequacy (RA) must-offer obligations.

2. Please provide your organization's comments on the market power mitigation topic:

CalCCA has no comments at this time.

3. Please provide your organization's comments on the accounting for energy offer price in upward capacity procurement topic:

CalCCA has no comments at this time.

4. Please provide your organization's comments on the resource adequacy real-time must offer obligation topic:

CalCCA appreciates the CAISO reconsidering its proposal to remove the resource adequacy real-time must offer obligation. The CAISO's proposal to have the Local Regulatory Authority (LRA) elect to require the real-time must offer obligation, however, creates challenges around enforceability. Because the CAISO is the entity that accepts the bids offered into the market, there is no way to ensure RA resources with an offer obligation imposed by the LRA is offering in real-time until after the fact. If the LRA determines there is a reliability benefit to maintaining the real-time must offer obligation, the CAISO should enforce the must offer obligation and insert bids for resources with a must offer obligation so that bids are in fact available in real-time.

CalCCA supported the transition period in the previous proposal that would require RA resources to bid zero dollars into the Residual Unit Commitment (RUC) until the Extended Day-Ahead Market (EDAM) is implemented to allow time for parties to consider alternatives. Now that EDAM and DAME's planned implementation dates are on the same timeline and there is no time for a transition period, CalCCA requests the CAISO consider this issue in a coordinated manner between EDAM and DAME. CalCCA agrees with the CAISO that California resources should not effectively provide capacity to other balancing authorities at zero cost; a potential result of maintaining the zero dollar bidding requirement. The CAISO and stakeholders should consider alternatives within the EDAM initiative so capacity paid to be available through real-time

are not paid for twice; once through bi-lateral RA transactions and again through imbalance reserve payments. It is not clear the benefits of the DAME proposal outweigh the costs resulting from these impacts to RA. Additional discussion is needed to ensure imbalance reserves paid for by California LSEs will be available to serve California load under the context of EDAM.

5. Please let us know if you have additional comments (optional):

CalCCA has no additional comments at this time.