

California Community Choice Association

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Contact

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1. GENERAL COMMENTS: Please provide a summary of your organization's comments on the Extended Day-Ahead Market revised straw proposal:

The California Community Choice Association (CalCCA) appreciates the extensive work by the California Independent System Operator Corporation (CAISO) and stakeholders on the Extended Day-Ahead Market (EDAM) Revised Straw Proposal and the opportunity to comment on the proposal. In summary:

- CalCCA remains concerned about the impacts the imbalance reserve product proposed in the Day-Ahead Market Enhancements (DAME) initiative will have on the California resource adequacy (RA) program;
- CalCCA supports a voluntary EDAM participation model in which all resources within the EDAM balancing authority area (BAA) participate in the market through economic bids or self-schedules;
- CalCCA generally supports EDAM transfers receiving equal priority to load but asks for further consideration around the situation where an economic import into CAISO supports an EDAM transfer out of CAISO;
- CalCCA does not oppose the proposal to give BAA operators the discretion to assign lower priority to EDAM transfers into a BAA that failed the day-ahead resource sufficiency evaluation (RSE) so long as it is reserved for emergency situations and so long as EDAM BAAs and/or their load serving entities (LSEs) have opportunities to cure the RSE deficiency first;
- CalCCA generally supports the concept of transmission “buckets” as a way to frame the discussion around the treatment of different types of transmission;
- CalCCA supports the CAISO’s proposal to automatically make bucket 2 transmission not scheduled by 10:00 a.m. available to the EDAM for optimization through the market;
- The CAISO should not make costs associated with new transmission build eligible for transmission revenue recovery;
- CalCCA supports the RSE framework that would conduct the binding EDAM RSE at 10:00 a.m. prior to running the day-ahead market with the ability to conduct advisory runs prior to the binding run;
- CalCCA supports the proposal to not include transmission constraints within the EDAM RSE and monitor the results of the EDAM RSE at the onset of EDAM;
- CalCCA supports the ability to count WSPP Schedule-C contracts and import bids at the CAISO BAA border in the RSE;
- The curing process to resolve an RSE shortfall in the CAISO BAA requires further development given the BAA is not the LSE and multiple LSEs are contributing towards meeting the resource sufficiency evaluation;

- CalCCA supports including BAAs that pass the day-ahead RSE or cure a day-ahead RSE insufficiency by the short-term unit commitment (STUC) horizon in the pooled Western Energy Imbalance Market (WEIM) RSE;
- Of the two mechanisms proposed to manage supply in excess of the RSE, CalCCA prefers mechanism two (the net EDAM transfer export limit constraint);
- CalCCA supports the development of system market power mitigation for the CAISO BAA; and

CalCCA supports the resource-specific approach for green-house gas (GHG) accounting in EDAM. Any future modifications to the resource-specific approach for EDAM, or any deviations from the resource-specific approach, will require California Air Resources Board (CARB) acceptance.