

# California Community Choice Association

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## Contact

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

The California Community Choice Association (CalCCA) provides redline edits and an embedded comment to section 11.2.6.1 (see attachment) of the California Independent System Operator's (CAISO) revised draft tariff language. These edits would allow resources and load serving entities (LSE) to complete the Day-Ahead Market Enhancements (DAME) Transitional Measures election process at any time during the three-year DAME Transition Period. It would require entities to provide 30 days' notice to the CAISO of their election. This change reflects the fact that LSEs and resources may enter into Resource Adequacy (RA) contracts on a monthly basis and may enter into new RA contracts after the effective date of the tariff. CalCCA's changes are consistent with the policy in the Revised Final Proposal, which did not communicate a one-time election process.<sup>[1]</sup>

As discussed at the June 23, 2023 call on the Draft Tariff Language, these changes are necessary because, while many RA contracts require the generator to transfer availability payments to its LSE counterparty, RA resources bid zero dollars Residual Unit Commitment (RUC) availability bids and get paid zero dollars for RUC awards. As such, many RA counterparties do not have the systems and processes in place to facilitate the transfer of such payments. Once DAME goes into effect and generators will be paid for their imbalance reserve and reliability capacity payments, a settlement process must be in place that accommodates existing contracts *and* contracts entered into during the transitional period to allow for the transfer of these payments from RA resources to LSEs. During the first three years of DAME, this settlement process should be the DAME Transitional Measures to give LSEs time to develop their own settlement processes.

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[1] *Day-Ahead Market Enhancements Revised Final Proposal at 50: <http://www.caiso.com/InitiativeDocuments/RevisedFinalProposal-Day-AheadMarketEnhancements.pdf>.*

## Attachments

- [CalCCA Edits to CAISO Revised Draft Tariff Language DAME 07 25 23.docx](#)