

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator
Corporation)

Docket No. ER23-2686-000

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION’S
COMMENTS ON THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION’S TARIFF AMENDMENT**

Pursuant to Rule 211 of the Federal Energy Regulatory Commission’s (Commission) Rules of Practice and Procedure,¹ 18 C.F.R. Section 385.212 (2023), the California Community Choice Association² (CalCCA) submits these comments to the California Independent System Operator Corporation’s (CAISO) tariff amendment to enhance and extend its day-ahead market in the West³ (CAISO Filing), dated August 22, 2023.

I. INTRODUCTION

The CAISO filing proposes tariff amendments to implement the Day-Ahead Market Enhancements (DAME) and Extended Day-Ahead Market (EDAM) initiatives.

DAME would establish the imbalance reserve and reliability capacity products to address

¹ Federal Energy Regulatory Commission’s Rules of Practice and Procedure, Part 385: <https://www.ecfr.gov/current/title-18/chapter-I/subchapter-X/part-385#part-385>.

² California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale’s Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

³ California Independent System Operator Corporation’s Tariff Amendment, ER23-2686-000 (Aug. 22, 2023): https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230822-5161&optimized=false.

increasing system variability and uncertainty. EDAM would extend access to its day-ahead market to other balancing authorities in the western interconnection. CalCCA supports the DAME and EDAM proposals and appreciates the extensive and inclusive stakeholder processes held by CAISO staff to develop them. However, the proposed tariff provision in section 33.18.2.2.3, which would afford intra-day self-schedules using firm OATT transmission service rights higher priority than cleared day-ahead schedules, should be accompanied by monitoring and reporting requirements. These requirements are necessary to ensure no balancing authorities use these provisions inconsistent with their OATTs or in a manner that unduly impacts market outcomes for all balancing authorities. CalCCA therefore recommends the Commission require the CAISO to regularly report on the reliance on this provision for the use of existing rights after the day-ahead market has closed. This will enable the Commission and market participants to determine if the provision is just and reasonable.

II. THE COMMISSION SHOULD REQUIRE THE CAISO TO REGULARLY REPORT ON THE USE OF THE PROVISION IN SECTION 33.18.2.2.3 THAT WOULD AFFORD INTRA-DAY SELF-SCHEDULES USING FIRM OATT TRANSMISSION SERVICE RIGHTS HIGHER PRIORITY THAN CLEARED DAY-AHEAD SCHEDULES

During the stakeholder process, in the context of the interoperability of EDAM and the Western Resource Adequacy Program (WRAP), some stakeholders contended that real-time self-schedules to support WRAP transactions using firm or conditional firm transmission service should be given a higher scheduling priority than the cleared day-ahead schedules. The CAISO did not adopt a scheduling priority specific to resource adequacy or WRAP. The CAISO instead included a tariff provision that would allow the CAISO to provide certain intra-day self-schedules using specific firm Open Access Transmission Tariff (OATT) transmission service rights, which may include WRAP

schedules or other OATT needs, to receive higher priority than cleared day-ahead schedules when instructed by EDAM transmission providers acting in accordance with their OATTs.⁴

CalCCA agrees with the CAISO's approach. Throughout the EDAM stakeholder process, CalCCA has supported an EDAM design that maximizes transmission availability to the day-ahead market to allow for the full realization of the benefits market optimization provides. At the same time, CalCCA understands that EDAM transmission providers' OATT requirements may require self-schedules with higher priority than the schedule provided by the day-ahead market. WRAP participation is not a requirement for EDAM participation and vice versa, but the CAISO should allow EDAM transmission providers to indicate when self-schedules should supersede cleared day-ahead schedules if the balancing authority's OATT requires it.

However, this provision will result in redispatch and impact market clearing. To avoid either of these scenarios, the Commission should require the CAISO to regularly monitor and report on the use of the tariff provision. These monitoring and reporting requirements would allow the Commission and market participants to assess how often these provisions are used, understand the impact to market results, and whether these provisions are used consistent with OATT requirements.

The Commission should direct the CAISO to monitor and report to the Commission on the use of the provision in section 33.18.2.2.3 that would afford intra-day self-schedules using firm OATT transmission service rights higher priority than cleared day-ahead schedules. This reporting should occur on a monthly basis for the first year of operation

⁴ CAISO Filing at 142.

under this tariff provision, at which point, the reporting should occur on a quarterly basis. This approach would require the CAISO to perform more frequent monitoring and reporting early while the CAISO and other EDAM entities are adjusting to a broader day-ahead market footprint and these new provisions. After sufficient time, monitoring will continue on a less frequent cadence to ensure the provisions remain just and reasonable.

III. CONCLUSION

CalCCA respectfully requests that the Commission accept the CAISO Filing but direct the CAISO to monitor and report to the Commission on the use of the provision in section 33.18.2.2.3 that would afford intra-day self-schedules using firm OATT transmission service rights higher priority than cleared day-ahead schedules. This reporting should occur on a monthly basis for the first year of operation under this tariff provision. At which point, the reporting should occur on a quarterly basis.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl".

Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

September 21, 2023

CERTIFICATE OF SERVICE

I, Shawn-Dai Linderman, hereby certify that I have this day served a true copy of **CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S TARIFF AMENDMENT** by electronic mail to each party of record designated on the official service list in the above-captioned proceeding.

Executed on **September 21, 2023**, at Martinez, California.

/s/ Shawn-Dai Linderman
Shawn-Dai Linderman

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