

November 12, 2020

Delivered via CAISO Comment Portal

RE: UAMPS Comments on the Straw Proposal - Extended Day-Ahead Market (EDAM) - Bundle One Topics

UAMPS appreciates the opportunity by the CAISO to participate in this process and offer comments to this straw proposal. The Utah Associated Municipal Power Systems (UAMPS) is a governmental agency that provides comprehensive wholesale electric energy, on a nonprofit basis, to community-owned power systems throughout the Intermountain West. The UAMPS membership represents 47 members from Utah, California, Idaho, Nevada, New Mexico and Wyoming.

1. Section 3 Other

It states: "Stakeholders also suggested guarantees for cost recovery on the procurement of gas, where nomination timelines do not align with EDAM." UAMPS strongly opposes any type of cost recovery for fuel nominations or fuel imbalance penalties as it can set precedent for other cost recoveries for natural commodity risk which already takes place in markets across the U.S.

2. Section 4.5 Timeline

UAMPS would ask the CAISO and potential EDAM entities to consider its transmission customers' needs when constructing the market timelines for running the EDAM market. UAMPS would not want to be forced into a position where it either must over or under procure network or point to point transmission before the freeze of OATT transmission bilateral sales during the resource sufficiency evaluation and EDAM's optimization process. This is mainly due to uncertainty of the source of long-term contracts that have flexible delivery points on a day ahead basis. We imagine there are other EDAM entity transmission customers with similar contracts.

3. Section 5.2 Internal Transmission limits determined by EDAM balancing authority

The CAISO asks for feedback how physical transmission capability internal to an EDAM balancing authority area should be considered in the EDAM model and optimization while honoring non-participating rights on internal transmission. UAMPS would like to engage further with EIM/EDAM entities on this topic.

4. Section 5.3 Transmission to enable EDAM transfers

Can a transmission customer, within an EDAM BAA, offer bucket 2 or 3 transmission and receive transfer revenue for transmission it owns within a non-EDAM BAA, that can facilitate transfers between two EDAM entities?

5. 6.3 Congestion revenue

UAMPS, as a transmission customer, would prefer EDAM entities utilize the ".....CAISO's congestion revenue rights design to distribute congestion revenue to its transmission customers that are participating in the EDAM, in which case the CRR holder will be compensated directly by the CAISO."

6. UAMPS encourages the CAISO to integrate its new initiative on the Western EIM Sub-Entity Scheduling Coordinator Role - Issue Paper/Straw Proposal with principles in the EDAM construct.