

Overview of Tariff Sections Subject to Joint Authority or Subject to Approval by the Board Only Under The “Applied To” Test

In its July 19, 2021 Phase Two Draft Final Proposal, the Governance Review Committee (GRC) included a Tariff Table of Contents document that showed, on an illustrative basis, which sections of the CAISO tariff generally would be subject to Joint Authority under the “applies to” test that the GRC was recommending be adopted. At that time, the EDAM proposal had not yet been developed, so the document focused only on which rules would be subject to Joint Authority for the WEIM and which would be “Not Applicable”, meaning they would be subject to approval only by the Board of Governors.¹

In response to stakeholder comment and at the GRC’s request, the CAISO staff has now updated that Tariff Table of Contents document to reflect the current best understanding of how the Joint Authority designations would change if the “applies to” test were extended to EDAM under the formulation of the test set forth in the GRC’s July 15, 2022 Phase Three Straw Proposal.

To show this, we have retained the original designations that were presented in the earlier Tariff Table of Contents for WEIM and added immediately after each designation a further description of how, if at all, the designation would potentially change under EDAM. The original WEIM designations are shown in red font, and the new EDAM information is shown in blue font.

It is important to note that the information contained in this updated Tariff Table of Contents is preliminary and in some cases cannot be stated with certainty because the EDAM policy and the tariff framework to implement the policy are both still under development. The information reflects CAISO staff’s best understanding at this time based on where things currently stand.

Like its predecessor, this version of the Tariff Table of Contents document is also illustrative in the sense that it is an attempt to illustrate how the “applies to” test would play out in context, rather than a systematic attempt to permanently divide up the tariff by fixed section headings into those that are subject to Joint Authority and those that are or not. Because the tariff is a highly detailed and constantly evolving document, it is not practical to use a table of contents of the tariff at any one point in time to establish a fixed and binding classification of what is subject to Joint Authority and what is not.

While the Tariff Table itself is the best source for a detailed understanding of how the “applies to” test would work, a more general summary may be helpful as well.

As shown in the Tariff Table, the following Sections of the Tariff would be either entirely or partially subject to Joint Authority:

¹ The Tariff Table did not address the Governing Body’s advisory input role, which in some cases would come into play for topics that are not subject to Joint Authority.

Section 1: Definitions and Interpretation
Section 6: Communications
Section 10: Metering
Section 11: CAISO Settlements and Billing
Section 12: Creditworthiness
Section 13: Dispute Resolution
Section 14: Uncontrollable Force, Indemnity, Liabilities, and Penalties
Section 20: Confidentiality
Section 22: Miscellaneous
Section 27: CAISO Markets and Processes
Section 29: Energy Imbalance Market
Section 30: Bid and Self-Schedule Submission for all CAISO Markets
Section 31: Day-Ahead Market
Section 33: Enhanced Day-Ahead Market [New section to be added to Tariff]
Section 34: Real-Time Market
Section 35: Market Validation and Price Correction
Section 37: Rules of Conduct
Section 39: Market Power Mitigation Procedures
Section 44: Flexible Ramping Product

Also as shown in the Tariff Table, the following Sections of the Tariff would be either entirely or near entirely outside the scope of Joint Authority:

Section 2: Access to the CAISO Controlled Grid
Section 3: Local Furnishing, Other Tax Exempt Bond Facility Financing
Section 4: Roles and Responsibilities
Section 5: Black Start and System Restoration
Section 7: System Operations Under Normal and Emergency Conditions
Section 8: Ancillary Services
Section 9: Outages
Section 15: Regulatory Filings
Section 16: Existing Contracts
Section 17: Transmission Ownership Rights
Section 19: Reliability Coordinator
Section 23: Categories of Transmission Capacity
Section 24: Comprehensive Transmission Planning Process
Section 25: Interconnection of Generating Units and Facilities
Section 26: Transmission Rates and Charges
Section 28: Inter-SC Trades
Section 36: Congestion Revenue Rights
Section 40: Resource Adequacy Demonstration for all SCs in the CAISO BAA
Section 41: Procurement of RMR Resources
Section 42: Adequacy of Facilities to Meet Applicable Reliability Criteria
Section 43A: Capacity Procurement Mechanism

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1. Definitions and Interpretation	Joint – these are general rules of construction and interpretation for the tariff and thus apply to EIM. Note that Section 1.2 points to Appendix A for definitions. As noted below in the comments on Appendix A, all of the definitions for terms that apply to EIM would be subject to Joint Authority This stays the same for EDAM.
1.1 General Provisions of Article I Applicable To CAISO Tariff	
1.2 Definitions	
1.3 Rules of Interpretation	
1.3.1 “Includes” Means “Including Without Limitation”	
1.3.2 Specific Rules of Interpretation Subject to Context	
2. Access to the CAISO Controlled Grid	N/A: applies to CAISO BA and Controlled Grid only This stays the same for EDAM.
2.1 Open Access	
2.2 Customer Eligibility for Direct Access or Wholesale Sales	
3. Local Furnishing, Other Tax Exempt Bond Facility Financing	N/A: applies to CAISO Controlled Grid only This stays the same for EDAM.
4. Roles and Responsibilities	N/A, except Joint for 4.5.1 – Section 29 establishes stand-alone roles and responsibilities for EIM and does not incorporate any of these roles, with the exception of Section 4.5.1 (relating to SC certification). This stays the same for EDAM
4.1 [Not Used]	
4.2 Market Participant Responsibilities	

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4.17.6 Operating Requirements	
5. Black Start and System Restoration	N/A – Applies to CAISO BA only This stays the same for EDAM.
5.1 Black Start Capability	
5.2 Black Start Units	
5.3 Black Start Services	
6. Communications	Joint (specifically for rules applicable to EIM/RTM) – Section 29.6 generally provides that the provisions in Section 6 that apply to the RTM apply equally to EIM with limited exceptions. Those provisions in Section 6 would be subject to Joint Authority. Under EDAM, Joint Authority would also extend to the provisions in Section 6 that are applicable to both the Day-Ahead Market and EDAM. The new EDAM section of the tariff (Section 33) will identify those provisions.
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6.1.4 Information Transfer from CAISO to Scheduling Coordinator	
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7. System Operations Under Normal and Emergency Conditions	<p>Mostly N/A – Mostly applies only to CAISO BA and CAISO Controlled Grid. Section 29.7 specifically excludes EIM from most of the rules in this section and establishes a separate set of rules regarding operations under normal and emergency conditions for EIM. Section 29.7 does incorporate certain aspects of subsections 7.7.6, 7.7.7, and 7.7.9, which would be subject to Joint Authority.</p> <p>This should be the essentially same under EDAM – i.e., mostly N/A but with some specifically incorporated subsections subject to Joint Authority. The details need to await further development of the policy and related tariff framework.</p>

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7.7.11 [Not Used]	
7.7.12 [Not Used]	
7.7.13 [Not Used]	
7.7.14 [Not Used]	
7.7.15 [Not Used]	
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7.9.1 Suspension or Limitation Generally	
7.9.2 Reasons for Suspension or Limitation	
7.9.3 Procedures Regarding Suspension or Limitation	
8. Ancillary Services	N/A – Applies only to CAISO BA
	This stays the same for EDAM. <u>Note:</u> If EDAM in the future includes Ancillary Services (as some have suggested), some or all of this Section may become subject to Joint Authority.
8.1 Scope	
8.2 Ancillary Services Standards	
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8.9.14 [Not Used]	
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8.10.6 [Not Used]	
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8.10.8 Rescission of Payments for Ancillary Service Capacity	
8.11 Temporary Changes to Ancillary Service Penalties	
8.11.1 Application and Termination	
8.11.2 Exemption for Penalties Due to CAISO Software Limitations	
9. Outages	<p>Mostly N/A – This Section is for the most part N/A because Section 29.9 generally exempts EIM from these rules regarding outage management and creates outage management rules specific to EIM. Section 29.9 does, however, incorporate by reference certain deadlines regarding notification of outages from this section, which would be subject to Joint Authority. Section 29.9 also incorporates by reference provisions in Section 9.3.6 regarding the contents of notices applicable to EIM, which also would be Joint.</p> <p>This should be the essentially same under EDAM – i.e., mostly N/A but with some specifically incorporated subsections subject to Joint Authority. The details need to await further development of the policy and related tariff framework.</p>
9.1 Coordination and Approval for Outage	
9.2 Responsibility for Authorized Work on Facilities	
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9.5.1 Approved Maintenance Outages	
9.5.2 Publication to Website	
9.6 Facility Power	
9.7 Multi-Stage Generating Resources Outages	
10. Metering	<p>Joint (specifically where applicable to EIM) – Section 29 generally applies the provisions of this Section 10 on metering to the EIM, with the exception of certain requirements in Section 10.3.9. All such applicable provisions would be subject to Joint Authority.</p> <p>This should be the essentially same under EDAM – i.e., generally subject to Joint Authority with the exception of any requirements exempted from EDAM. The details need to await further development of the policy and related tariff framework.</p>
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10.3.15 [Not Used]	
10.3.16 [Not Used]	
10.3.17 Meter Identification	
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10.4.1 Authority to Grant Exemptions	
10.4.2 Guidelines for Granting Exemptions	
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11. CAISO Settlements and Billing	<p>Partially Joint -- This Section is N/A for many sections because Section 29.11 generally exempts EIM from these rules regarding settlements and billing and creates a separate set of rules on this topic that are specific to EIM. Section 29.11 does, however, incorporate by reference certain subsections (or portions of subsections) of Sections 11.5, 11.8, 11.10, 11.14, 11.21, 11.25, 11.28, 11.29, 11.31, and 11.32, which would be subject to Joint Authority.</p> <p>Any settlement and billing rules applicable to EDAM will be subject to Joint Authority. It is, however, uncertain at this time how the EDAM tariff framework will capture settlements and billing rules that apply to EDAM. It is thus not possible to predict what specific additional portions of Section 11 will become subject to Joint Authority.</p>
11.1 Settlement Principles	
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11.1.2 Settlement Charges and Payments	
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11.1.4 CAISO Estimates for Initial Settlement Statement T+3B	
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11.8.4 RTM Bid Cost Recovery Amount	
11.8.5 Unrecovered Bid Cost Uplift Payment	
11.8.6 System-Wide IFM, RUC and RTM Bid Cost Uplift Allocation	
11.9 Inter-SC Trades	
11.9.1 Physical Trades	
11.9.2 Inter-SC Trades at Aggregated Pricing Nodes	
11.10 Settlements for Ancillary Services	
11.10.1 Settlements for Contracted Ancillary Services	
11.10.2 Settlement for User Charges for Ancillary Services	
11.10.3 Spinning Reserves	
11.10.4 Non-Spinning Reserves	
11.10.5 Negative Operating Reserve Obligation Adjustment	
11.10.6 Upward Ancillary Services Neutrality Adjustment	
11.10.7 Voltage Support	
11.10.8 [Not Used]	
11.10.9 Settlements of Rescission of Payments for AS Capacity	
11.11 RACs and Wheeling Transactions	
11.11.1 Regional Access Charge	

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11.11.2 Wheeling Through and Wheeling Out Transactions	
11.12 Participating Intermittent Resources	
11.12.1 [Not Used]	
11.12.2 [Not Used]	
11.12.3 Payment of Participating Intermittent Resource Fees	
11.12.4 [Not Used]	
11.13 Settlements of RMR Charges and Payments	
11.13.1 Daily RMR Settlement	
11.13.2 Daily RMR Capacity Payment	
11.13.3 Daily Variable Cost Payment	
11.13.4 Daily Additional Cost Settlement	
11.13.5 Daily RMR Excess Revenues	
11.13.6 Daily RMR Exceptional Dispatch Excess Revenues	
11.13.7 Daily RMR Cost Allocation	
11.13.8 [Not Used]	
11.13.9 [Not Used]	
11.13.10 [Not Used]	
11.14 Neutrality	
11.15 Payments Under Section 42.1 Contracts	
11.16 Additional AS and RUC Payment Rescission Requirements	
11.16.1 Resources with More Than One Capacity Obligation	
11.16.2 Load-Following MSSs with an AS or RUC Capacity Obligation	
11.17 Application of the Persistent Deviation Metric	
11.17.1 Persistent Deviation Threshold and Mitigation	
11.17.2 Shut-Down Adjustment	
11.17.3 Application of Persistent Deviation Metric to Eligible Intermittent Resources' Residual Imbalance Energy	
11.18 Emissions Costs	
11.18.1 Obligation to Pay Emissions Costs Charges	
11.18.2 CAISO Emissions Costs Trust Account	
11.18.3 Rate for the Emission Cost Trust Account	
11.18.4 Adjustment of the Rate for the Emissions Cost Charge	
11.18.5 Credits and Debits of Emissions Cost Charges from SCs	

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11.18.6 Submission of Cost Invoices by RMR Owner	
11.18.7 Payment of Emissions Cost Invoices	
11.19 FERC Annual Charges	
11.19.1 FERC Annual Charge Recovery Rate	
11.19.2 FERC Annual Charge Trust Account	
11.19.3 Determination of the FERC Annual Charge Recovery Rate	
11.19.4 Credits and Debits of FERC Annual Charges from SCs	
11.20 NERC/WECC Charges	
11.20.1 Responsibility for NERC/WECC Charges	
11.20.2 [Not Used]	
11.20.3 [Not Used]	
11.20.4 Process for Invoicing NERC/WECC Charges	
11.20.5 Timely Payments	
11.20.6 NERC/WECC Charge Trust Account	
11.20.7 Preliminary and Final NERC/WECC Charge Invoices	
11.20.8 Provision of Payments and Information to the WECC	
11.20.9 Reliability Coordinator Services Charge	
11.21 Make Whole Payments for Price Corrections	
11.21.1 CAISO Demand and Exports	
11.21.2 Price Correction for Settlement of Virtual Awards	
11.22 Grid Management Charge	
11.22.1 CAISO's Obligation	
11.22.2 Costs Recovered Through the Grid Management Charge	
11.22.3 [Not Used]	
11.22.4 TOR Charges	
11.22.5 Bid Segment Fee	
11.22.6 CRR Transaction Fee	
11.22.7 Inter-Scheduling Coordinator Trade Transaction Fee	
11.22.8 Scheduling Coordinator ID Charge	
11.23 Penalties for Uninstructed Imbalance Energy	
11.24 [Not Used]	
11.24.1 [Not Used]	
11.24.2 [Not Used]	

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11.24.3 [Not Used]	
11.24.4 [Not Used]	
11.25 Settlement of Flexible Ramping Product	
11.25.1 Settlement of Forecasted Movement	
11.25.2 Settlement of Uncertainty Requirement	
11.25.3 Rescission	
11.25.4 [Not Used]	
11.25.5 [Not Used]	
11.26 [Not Used]	
11.27 Voltage Support Charges	
11.28 Calculating, Charging and Disbursing Default Interest	
11.29 CAISO as Counterparty; Billing and Payment	
11.29.1 Billing and Payment Process Based on Settlement Statement	
11.29.2 Time-Frame for Payments or Charges	
11.29.3 Prepayments	
11.29.4 System Failure	
11.29.5 General Principles for Production of Settlement Statements	
11.29.6 Balancing of Market Accounts in Absence of Meter Data	
11.29.7 Settlements Cycle	
11.29.8 Confirmation and Validation	
11.29.9 Payment Procedures	
11.29.10 Billing and Payment	
11.29.11 Instructions for Payment	
11.29.12 CAISO's Responsibilities	
11.29.13 Non-Payment by a Scheduling Coordinator or CRR Holder	
11.29.14 Enforcement Actions for Late Payments	
11.29.15 [Not Used]	
11.29.16 Prohibition on Transfers	
11.29.17 Alternative Payment Procedures	
11.29.18 [Not Used]	
11.29.19 Payment Errors	

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11.29.20 Defaults	
11.29.21 [Not Used]	
11.29.22 Data Gathering and Storage	
11.29.23 Communications	
11.29.24 CAISO Payments Calendar	
11.30 Auditing	
11.31 Intertie Schedules Decline Charges	
11.31.1 Decline Monthly Charge – Imports	
11.31.2 Decline Monthly Charge – Imports	
11.31.3 Allocation of Import/Export Decline Monthly Charges	
11.32 Measures to Address Intertie Scheduling Practices	
11.33 Setting Revenue	
11.34 Invoice Charges for Transferred Frequency Response	
11.34.1 Charge Allocation Basis	
11.34.2 Calculation and Assessment	
11.34.3 Responsibility to Pay Charges	
11.34.4 Validation	
11.34.5 Disputes and Corrections	
11.34.6 Payment Default	
11.34.7 Modification to Schedule	
12. Creditworthiness	<p>Mostly Joint –This section would be for the most part subject to Joint Authority because Section 29 generally incorporates the entirety of this section by reference. However, the subsections and provisions within subsections that have no application to the EIM or RTM – such as those applying to CRRs or Virtual Bids (see 12.6 and 12.8) – would not be Joint and instead would be N/A.</p> <p>This stays the same for EDAM, except that credit rules relating to Virtual Bidding will also be subject to Joint Authority because EDAM will include Virtual Bidding. <u>Note: If EDAM in the future includes CRRs (as some</u></p>

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	have suggested), Credit provisions for CRRs would also be subject to Joint Authority.
12.1 Credit and Minimum Participation Requirements	
12.1.1 Unsecured Credit Limit	
12.1.2 Financial Security and Financial Security Amount	
12.1.3 Estimated Aggregate Liability	
12.2 Review of Creditworthiness	
12.3 Posting and Releases of Financial Security	
12.3.1 Self-Supply of UDC Demand	
12.4 Calculation of Ongoing Financial Security Requirements	
12.4.1 Resolution of a CAISO Request for Additional Security Amount	
12.4.2 Dispute Process for a Request for Additional Security Amount	
12.5 CAISO Enforcement Actions	
12.5.1 Under-Secured and Non-Compliant Market Participants	
12.5.2 Late Posting Of Financial Security	
12.6 Credit Obligations Applicable to CRRs	
12.6.1 Credit Requirements for CRR Allocations	
12.6.2 Credit Requirements for CRR Auctions	
12.6.3 Credit Requirements for the Holding of CRRs	
12.6.4 Credit Requirements for Sales of Allocated CRRs	
12.7 [Not Used]	
12.8 Credit Requirements Applicable to Virtual Bids	
12.8.1 Credit Check in the Day-Ahead Market	
12.8.2 Virtual Bid Reference Prices	
12.8.3 Adjustment of EAL after Close of the DAM	
12.8.4 Adjustment of EAL after the Close of the RTM	
13. Dispute Resolution	<p>Joint - Section 29.13 generally incorporates Section 13 by reference, which makes these provisions applicable to EIM and therefore subject to Joint Authority.</p> <p>This stays the same for EDAM.</p>

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13.1 Applicability	
13.1.1 General Applicability	
13.1.2 Disputes Involving Government Agencies	
13.1.3 Injunctive and Declaratory Relief	
13.1.4 Disputes Arising Under Section 11	
13.2 Negotiation and Mediation	
13.2.1 Negotiation	
13.2.2 Statement of Claim	
13.2.3 Selection of Mediator	
13.2.4 Mediation	
13.2.5 Demand for Arbitration	
13.3 Arbitration	
13.3.1 Selection of Arbitrator	
13.3.2 Disclosures Required of Arbitrators	
13.3.3 Arbitration Procedures	
13.3.4 Modification of Arbitration Procedures	
13.3.5 Remedies	
13.3.6 Summary Disposition	
13.3.7 Discovery Procedures	
13.3.8 Evidentiary Hearing	
13.3.9 Confidentiality	
13.3.10 Timetable	
13.3.11 Decision	
13.3.12 Compliance	
13.3.13 Enforcement	
13.3.14 Costs	
13.4 Appeal of Award	
13.4.1 Basis for Appeal	
13.4.2 Appellate Record	
13.4.3 Procedures for Appeals	
13.4.4 Award Implementation	
13.4.5 Judicial Review of FERC Orders	
13.5 Allocation of Awards Payable by or to the CAISO	
13.5.1 Allocation of an Award	

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13.5.2 Timing of Adjustments	
13.5.3 Method of Allocation	
14. Uncontrollable Force, Indemnity, Liabilities, and Penalties	<p>Joint - Section 29.14 generally incorporates Section 14 by reference, which makes these provisions applicable to EIM and therefore subject to Joint Authority.</p> <p>This stays the same for EDAM.</p>
14.1 Uncontrollable Forces	
14.2 Responsibilities of Affected Entity	
14.3 Strikes, Lockouts or Labor Disputes	
14.4 Market Participant's Indemnity	
14.5 Limitation on Liability	
14.5.1 Limitation on Damages	
14.5.2 Exclusion of Certain Types of Loss	
14.6 Potomac Economics, Ltd. Limitation of Liability	
14.7 Allocation of Reliability-Related Penalty Costs	
14.7.1 Overview of Process	
14.7.2 Direct Allocation of Reliability Standards Penalties	
14.7.3 Indirect Allocation of Penalty Costs	
15. Regulatory Filings	<p>N/A – not incorporated by reference in Section 29.</p> <p>This stays the same for EDAM.</p>
16. Existing Contracts	<p>N/A – not incorporated by reference in Section 29.</p> <p>The EDAM policy, as stated in the Revised Straw Proposal, contemplates that there will be provisions addressing the availability and administration of existing contracts and transmission ownership rights in connection with EDAM transfers. Those provisions will be subject to Joint Authority. It is, however, uncertain at this time how the EDAM tariff framework will capture these rules. To the extent the framework incorporates</p>

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	any sections within Section 16 or 17 of the tariff, those provisions would be subject to Joint Authority.
16.1 Continuation of Existing Contracts for Non-Participating TOs	
16.1.1 Participating TO Obligation	
16.1.2 Right to Use and Ownership of Facilities	
16.1.3 Existing Contract Dispute Resolution	
16.1.4 Conversion of PTO's Rights Under Existing Contracts	
16.2 [Not Used]	
16.3 Curtailment Under Emergency and Non-Emergency Conditions	
16.3.1 Emergency Conditions	
16.3.2 Non-Emergency Conditions	
16.4 TRTC Instructions	
16.4.1 Responsibility to Create TRTC Instructions	
16.4.2 Responsible PTO Re Multiple PTO Parties to Existing Contracts	
16.4.3 Scheduling Coordinator Responsibilities	
16.4.4 Submission of TRTC Instructions	
16.4.5 TRTC Instructions Content	
16.4.6 Changes and Updates to TRTC Instructions	
16.4.7 Treatment of TRTC Instructions	
16.4.8 CAISO Role in Existing Contracts	
16.4.9 Implementation of TRTC Instructions	
16.5 Treatment of Existing Contracts for Transmission Service	
16.5.1 System Emergency Exceptions	
16.6 Valid ETC Self-Schedules	
16.6.1 Validation of ETC Self-Schedules	
16.6.2 Treatment of Invalid ETC Self-Schedules	
16.6.3 Treatment of Valid ETC Self-Schedules	
16.6.4 Notification to SCs of CAISO Determination	
16.7 [Not Used]	
16.8 [Not Used]	
16.9 The HASP	
16.9.1 Scheduling Deadlines	
16.10 The CAISO's Real-Time Process	

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16.11 Inter-Balancing Authority Area ETC Self-Schedule Bid Changes	
16.12 Intra-Balancing Authority Area ETC Self-Schedules Changes	
17. Transmission Ownership Rights (TORs)	N/A – applies only to CAISO Controlled Grid. Section 29.17 thus does not incorporate this section and instead establishes a set of standalone transmission-related rules specific to EIM.
	The EDAM policy, as stated in the Revised Straw Proposal, contemplates that there will be provisions addressing the availability and administration of existing contracts and transmission ownership rights in connection with EDAM transfers. Those provisions would be subject to Joint Authority. It is, however, uncertain at this time how the EDAM tariff framework will capture these rules. To the extent the framework incorporates any sections within Section 16 or 17 of the tariff, those provisions would be subject to Joint Authority.
17.1 TRTC Instructions	
17.1.1 Responsibility to Create TRTC Instructions	
17.1.2 TOR Scheduling Coordinator Responsibilities	
17.1.3 Submission of TRTC Instructions	
17.1.4 TRTC Instructions Content	
17.1.5 Changes and Updates to TRTC Instructions	
17.1.6 CAISO Role in Accepting TRTC Instructions	
17.1.7 Implementation of TRTC Instructions	
17.2 Treatment of TORs	
17.2.1 System Emergency Expectations	
17.3 Valid TOR Self-Schedule	
17.3.1 Validation of TOR Self-Schedules	
17.3.2 Treatment of Invalid TOR Self-Schedules	
17.3.3 Settlement Treatment of Valid TOR Self-Schedules	
17.3.4 Notification to SCs of CAISO Determination	
17.4 The HASP	

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17.4.1 Scheduling Deadlines	
17.5 The CAISO's Real-Time Process	
17.6 Inter-Balancing Authority Area TOR Self-Schedule Bid Changes	
17.7 Intra-Balancing Authority Area TOR Self-Schedule Changes	
17.8 Existing Contracts Re TORs for Non-Participating TOs	
17.8.1 Participating TO Obligation	
17.8.2 Right to Use and Ownership of TORs	
17.8.3 Dispute Resolution for Existing Contracts Applicable to TORs	
17.9 Conversion of PTOs' Rights Under Existing Contracts Re TORs	
17.10 TOR Operations Obligations	
18. [Not Used]	
19. Reliability Coordinator	N/A – Section 29 does not incorporate any of the rules in this section.
	This stays the same for EDAM.
19.1 General Provisions	
19.2 Access to RC Services	
19.3 Supplemental Services – Hosted Advanced Network Applications (HANA)	
19.4 Supplemental Services – Physical Security Review	
19.5 Roles and Responsibilities	
19.6 Provision of Settlement Data by RC Customers	
19.7 Settlements and Billing for RC Customers	
19.8 Supplemental Services – HANA Services Charge	
19.9 Supplemental Services – Physical Security Review Charge	
19.10 Dispute Resolution Procedures	
19.11 Reliability Coordinator Oversight	
19.12 Uncontrollable Forces	
19.13 Liability	
19.14 Penalties	
19.15 Confidentiality	

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19.16 Miscellaneous Provisions in Addition to Section 22	
20. Confidentiality	Joint (specifically where applicable to EIM) -- Section 29 applies these confidentiality provisions to the EIM. This stays the same for EDAM. All confidentiality rules that apply to EDAM market participants in the Day-Ahead market will also be subject to Joint Authority.
20.1 CAISO	
20.2 Confidential Information	
20.3 Other Parties	
20.4 Disclosure	
20.5 Confidentiality	
21. [Not Used]	
22. Miscellaneous	Partially Joint – Under section 29.22, the provisions in Section 22 that apply to market participants are applicable to EIM. Those provisions, which are in Sections 22.2, 22.4, 22.5, and 22.7 through 22.13 would be subject to Joint Authority. The other subsections govern the CAISO and would be N/A. This stays the same for EDAM.
22.1 Audits	
22.1.1 Materials Subject to Audit	
22.1.2 CAISO Audit Committee	
22.1.3 Audit Results	
22.1.4 Availability of Records	
22.1.5 Confidentiality of Information	
22.1.6 Payments	
22.2 Assignment	
22.3 Term and Termination	
22.3.1 Effective Date of CAISO Tariff	

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22.3.2 Termination of CAISO Tariff with Board and FERC Approval	
22.4 Notice	
22.4.1 Effectiveness	
22.4.2 Addresses	
22.4.3 Notice of Changes in Operating Procedures and BPMs	
22.5 Waiver	
22.6 Staffing and Training to Meet Obligations	
22.7 Accounts and Reports	
22.8 Applicable Law and Forum	
22.9 Consistency with Federal Laws and Regulations	
22.10 Administrative Fees	
22.11 Operating Procedures and BPM Development and Amendment	
22.11.1 Process for Revisions of Business Practice Manuals	
22.11.2 Changes to BPM for BPM Change Management	
22.11.3 Requests for and Access to Nonpublic Operating Procedures	
22.12 [Not Used]	
22.13 Scheduling Responsibilities and Obligations	
23. Categories of Transmission Capacity	N/A – applies only to CAISO Controlled Grid; Section 29 does not incorporate this Section. This stays the same for EDAM.
24. Comprehensive Transmission Planning Process	N/A – applies only to CAISO Controlled Grid; Section 29 does not incorporate this Section This stays the same for EDAM.
24.1 Overview	
24.1.1 [Not Used]	
24.1.2 [Not Used]	
24.1.3 [Not Used]	
24.1.4 [Not Used]	
24.2 Nature of the Transmission Planning Process	

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24.2.1 [Not Used]	
24.2.2 [Not Used]	
24.2.3 [Not Used]	
24.2.4 [Not Used]	
24.3 Transmission Planning Process Phase	
24.3.1 Inputs to the Unified Planning Assumptions and Study Plan	
24.3.2 Content of the Unified Planning Assumptions and Study Plan	
24.3.3 Stakeholder Input – Unified Planning Assumptions/Study Plan	
24.3.4 Economic Planning Studies	
24.3.5 [Not Used]	
24.4 Transmission Planning Process Phase 2	
24.4.1 Conducting Technical Studies	
24.4.2 Proposed Reliability Driven Transmission Solutions	
24.4.3 Phase 2 Request Window	
24.4.4 [Not Used]	
24.4.5 Determination of Needed Transmission Solutions	
24.4.6 Categories of Transmission Solutions	
24.4.7 Description of Transmission Solutions	
24.4.8 Additional Contents of Comprehensive Transmission Plan	
24.4.9 Phase 2 Stakeholder Process	
24.4.10 Transmission Plan Approval Process	
24.5 Transmission Planning Process Phase 3	
24.5.1 Competitive Solicitation Process	
24.5.2 Project Sponsor Application and Information Requirements	
24.5.3 Project Sponsor and Proposal Qualifications	
24.5.4 Project Sponsor Selection Factors and Comparative Analysis	
24.5.5 Notice to Project Sponsors	
24.5.6 Competitive Solicitation Project Proposal Fee	
24.6 Obligation to Construct Transmission Solutions	

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24.6.1 Approved Project Sponsor Reporting Requirements	
24.6.2 Delay in the Transmission Solution In-Service Date	
24.6.3 Development and Submittal of Mitigation Plans	
24.6.4 Inability to Complete the Transmission Solution	
24.7 Documentation of Compliance with NERC Reliability Standards	
24.8 Additional Planning Information	
24.8.1 Information Provided by Participating TOs	
24.8.2 Limitation on Regional Activities	
24.8.3 Information Requested from Load Serving Entities	
24.8.4 Information from BAAs and Regulators	
24.8.5 Obligation to Provide Updated Information	
24.9 Participating TO Study Obligation	
24.10 Operational Review and Impact Analysis	
24.10.1 [Not Used]	
24.10.2 [Not Used]	
24.10.3 [Not Used]	
24.10.4 [Not Used]	
24.11 [Not Used]	
24.11.1 [Not Used]	
24.11.2 [Not Used]	
24.11.3 [Not Used]	
24.12 WECC and Interregional Coordination	
24.13 Interregional Transmission Proposals in the Regional Process	
24.13.1 [Not Used]	
24.13.2 [Not Used]	
24.14 Cost Responsibility for Transmission Additions or Upgrades	
24.14.1 Project Sponsor Commitment to Pay Full Cost	
24.14.2 Cost of Needed Addition or Upgrade to be Borne by PTO	
24.14.3 CRR Entitlement for Project Sponsors Not Recovering Costs	
24.14.4 RAC Treatment of New Regional Transmission Facilities Costs	
24.15 Ownership of and Charges for Expansion Facilities	
24.15.1 Transmission Additions and Upgrades under TCA	

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24.15.2 Access and Charges for Transmission Additions and Upgrades	
24.16 Expansion by Local Furnishing Participating TOs	
24.17 Evaluation of Interregional Transmission Projects	
24.17.1 Submission of Interregional Transmission Projects	
24.17.2 Interregional Transmission Project Assessment	
24.17.3 Selection in the Comprehensive Transmission Plan	
24.17.4 Interregional Transmission Project Cost Recovery	
24.17.5 Monitoring the Status of Interregional Transmission Projects	
24.17.6 Delay in Interregional Transmission Project In-Service Date	
24.18 Order 1000 Common Interregional Tariff	
24.18.1 Annual Interregional Information Exchange	
24.18.2 Annual Interregional Coordination Meeting	
24.18.3 Interregional Transmission Project Joint Evaluation Process	
24.18.4 Interregional Cost Allocation Process	
24.18.5 Application of Regional Cost Allocation Methodology	
25. Interconnection of Generating Units and Facilities	N/A – applies only to CAISO Controlled Grid; Section 29 does not incorporate this Section
	This stays the same for EDAM.
25.1 Applicability	
25.1.1 Interconnection Request and Generating Unit Requirements	
25.1.2 Affidavit Requirements	
25.2 Interconnection to the Distribution System	
25.3 Maintenance of Encumbrances	
25.4 Asynchronous Generating Facilities	
25.4.1 Asynchronous Generating Facilities-Reactive Power	
25.5 Modifications to Generating Facilities	
25.5.1 <i>No Header</i>	
25.5.2 <i>No Header</i>	

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25.5.3 No Header	
26. Transmission Rates and Charges	N/A – applies only to charges within CAISO BA; Section 29.26 exempts EIM transfers from any charges under this section. The EDAM policy, as stated in the Revised Straw Proposal, contemplates that there will be provisions allowing for the recovery of historical transmission revenue that was foregone due to making transmission for EDAM transfers available hurdle-free. The tariff rules establishing this recovery will be subject Joint Authority. It is, however, uncertain at this time how the EDAM tariff framework will capture these rules. To the extent any of these rules are placed within this Section, they will be subject to Joint Authority. The currently existing rules in Section 26 will continue to apply only to the CAISO BA and thus will continue to be N/A.
26.1 Access Charge	
26.1.1 Publicly Owned Electric Utilities Access Charge	
26.1.2 Regional Access Charge Settlement	
26.1.3 Distribution of RAC Revenues	
26.1.4 Wheeling	
26.1.5 Unbundled Retail Transmission Rates	
26.2 [Not Used]	
26.3 Addition of New Facilities After CAISO Implementation	
26.4 Effect on Tax-Exempt Status	
26.5 [Not Used]	
26.6 Location Constrained Resource Interconnection Facilities	
26.6.1 LCRIFs that Become Network Facilities	
27. CAISO Markets and Processes	Joint (specifically where applicable to RTM/EIM) – Section 29 generally incorporates this section by reference for provisions applicable to both the RTM and EIM.

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	Under EDAM, Joint Authority would also extend to the provisions in Section 27 that are applicable to both the Day-Ahead Market and EDAM. The new EDAM section of the tariff (Section 33) will identify those provisions.
27.1 LMPs and Ancillary Services Marginal Prices	
27.1.1 Locational Marginal Prices for Energy	
27.1.2 Ancillary Service Prices	
27.1.3 Regulation Mileage Clearing Price	
27.2 Load Aggregation Points (LAP)	
27.2.1 Metered Subsystems	
27.2.2 Determination of LAP Prices	
27.3 Trading Hubs	
27.4 Optimization in the CAISO Market Processes	
27.4.1 Security Constrained Unit Commitment	
27.4.2 Security Constrained Economic Dispatch	
27.4.3 CAISO Markets Scheduling and Pricing Parameters	
27.5 Full Network Model	
27.5.1 Network Models used in CAISO Markets	
27.5.2 Metered Subsystems	
27.5.3 Integrated Balancing Authority Areas	
27.5.4 Accounting for Changes in Topology in IFM	
27.5.5 Load Distribution Factor	
27.5.6 Management & Enforcement of Constraints in the CAISO Markets	
27.6 State Estimator	
27.7 Constrained Output Generation	
27.7.1 Election of Constrained Output Generator Status	
27.7.2 Election to Waive COG Status	
27.7.3 Constrained Output Generators in the IFM	
27.7.4 Constrained Output Generators in RUC	
27.7.5 Constrained Output Generators in the Real-Time Market	
27.8 Multi-Stage Generating Resources	

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27.8.1 Registration and Qualification	
27.8.2 Information Requirements	
27.8.3 Changes in Status and Configurations of Resource	
27.9 Non-Generator Resources and Pumped-Storage Hydro Unit Constraints	
27.10 Election to Use Non-Generator Resource Generic Modeling Functionality	
27.11 Natural Gas Constraint	
27.12 Operator Imbalance Conformance	
27.12.1 Operator Conformance in the Real-Time Market	
27.12.2 Conformance Limiter in the Real-Time Market	
28. Inter-SC Trades	N/A – applies only to CAISO BA; Section 29 excludes these rules for EIM. This stays the same for EDAM.
28.1 Inter-SC Trades of Energy	
28.1.1 Purpose	
28.1.2 Availability of Inter-SC Trades of Energy	
28.1.3 Submission of Inter-SC Trades of Energy	
28.1.4 Information Requirements	
28.1.5 General Validation Rules for Inter-SC Trades	
28.1.6 Validation Procedures for Physical Trades	
28.2 Inter-SC Trades of Ancillary Services	
28.2.1 Information Requirements	
28.2.2 Validation	
28.2.3 Submission of Inter-SC Trades of Ancillary Services	
28.3 Inter-SC Trades of IFM Load Uplift Obligation	
28.3.1 Information Requirements	
28.3.2 Validation	
28.3.3 Submission of Inter-SC Trades of IFM Load Uplift Obligation	

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29. Energy Imbalance Market	Joint – All of the provisions in this Section would be subject to Joint Authority. This stays the same for EDAM. In other words, all of Section 29 continues to be subject to Joint Authority.
29.1 General Provisions.	
29.2 EIM Entity Access to the Real-Time Market	
29.3 [Not Used]	
29.4 Roles and Responsibilities	
29.5 [Not Used]	
29.6 Communications	
29.7 EIM Operations Under Normal and Emergency Conditions.	
29.8 [Not Used]	
29.9 Outages and Critical Contingencies.	
29.10 Metering and Settlement Data.	
29.11 Settlements and Billing for EIM Market Participants.	
29.12 Creditworthiness	
29.13 Dispute Resolution	
29.14 Uncontrollable Forces, Indemnity, Liabilities, and Penalties	
29.15 [Not Used]	
29.16 [Not Used]	
29.17 EIM Transmission System	
29.18 [Not Used]	
29.19 [Not Used]	
29.20 Confidentiality	
29.21 [Not Used]	
29.22 Miscellaneous Provisions in Addition to Section 22.	
29.23 [Not Used]	
29.24 [Not Used]	
29.25 [Not Used]	
29.26 Transmission Rates and Charges.	
29.27 CAISO Markets and Processes.	
29.28 Inter-SC Trades	
29.29 [Not Used]	

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29.30 Bid and Self-Schedule Submission for CAISO Markets.	
29.31 Day-Ahead.	
29.32 Greenhouse Gas Regulation and EIM Bid Adders.	
29.33 [Not Used]	
29.34 EIM Operations	
29.35 Market Validation and Price Correction	
29.36 [Not Used]	
29.37 Rules of Conduct	
29.38 Market Monitoring	
29.39 EIM Market Power Mitigation.	
29.40 [Not Used]	
29.41 [Not Used]	
29.42 [Not Used]	
29.43 [Not Used]	
29.44 Flexible Ramping Product	
30. Bid and Self-Schedule Submission for all CAISO Markets	<p>Joint (specifically where applicable to RTM/EIM) – Section 29 incorporates this section by reference for the provisions applicable to both RTM and EIM.</p> <p>Under EDAM, Joint Authority would also extend to the provisions in Section 30 that are applicable to both the Day-Ahead Market and EDAM. The new EDAM section of the tariff (Section 33) will identify those provisions.</p>
30.1 Bids, Including Self-Schedules	
30.1.1 Day-Ahead Market	
30.1.2 Real-Time Market	
30.2 Bid Types	
30.3 [Not Used]	
30.4 Proxy Cost and Registered Cost Methodologies	
30.4.1 Start-Up and Minimum Load Costs	
30.5 Bidding Rules	
30.5.1 General Bidding Rules	

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30.5.2 Supply Bids	
30.5.3 Demand Bids	
30.5.4 Wheeling Through Transactions	
30.5.5 Scheduling Sourcing/Sinking in Same Balancing Authority Area	
30.5.6 Non-Generator Resource Bids	
30.5.7 E-Tag Rules and Treatment of Intertie Schedules	
30.6 Bidding and Scheduling of PDRs and RDRRs	
30.6.1 Bidding and Scheduling of PDRs	
30.6.2 Bidding and Scheduling of RDRRs	
30.6.3 Net Benefits Test for PDRs or PDRRs	
30.7 Bid Validation	
30.7.1 Scheduling Coordinator Access	
30.7.2 Timing of CAISO Validation	
30.7.3 DAM Validation	
30.7.4 RTM Validation	
30.7.5 Validation of ETC Self-Schedules	
30.7.6 Validation and Treatment of Ancillary Services Bids	
30.7.7 Format and Validation of Operational Ramp Rates	
30.7.8 Format and Validation of Start-Up and Shut-Down Times	
30.7.9 Format and Validation of Start-Up Costs and Shut-Down Costs	
30.7.10 Format and Validation of Minimum Load Costs	
30.8 Bids on Out-of-Service Paths at Scheduling Points Prohibited	
30.9 Virtual Bids	
30.9.1 Virtual Bid Components	
30.10 Use of AC Solution and Nodal MW Constraints	
30.11 Filings to Recover Commitment-Related Fuel Costs	
30.12 [Not Used]	
30.12.1 [Not Used]	
30.12.2 [Not Used]	
30.12.3 [Not Used]	
30.12.4 [Not Used]	

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31. Day-Ahead Market	N/A – Section 29 excludes EIM from participating in DA market. This section will generally be subject to Joint Authority. Because the policy and tariff framework are not yet complete, we do not know at this time what, if any, provisions from this Section will be inapplicable to EDAM. To the extent there are any such provisions, they would be N/A.
31.1 Bid Submission and Validation in the Day-Ahead Market	
31.2 Day-Ahead MPM Process	
31.2.1 The Market Power Mitigation Process	
31.2.2 [Not Used]	
31.2.3 Bid Mitigation	
31.3 Integrated Forward Market	
31.3.1 Market Clearing and Price Determination	
31.3.2 Congestion and Transmission Losses Cost Determination	
31.3.3 Metered Subsystems	
31.4 CAISO Market Adjustments to Non-Priced Quantities in the IFM	
31.5 Residual Unit Commitment	
31.5.1 RUC Participation	
31.5.2 Metered Subsystem RUC Obligation	
31.5.3 RUC Procurement Target	
31.5.4 RUC Procurement Constraints	
31.5.5 Selection and Commitment of RUC Capacity	
31.5.6 Eligibility for RUC Compensation	
31.5.7 Rescission of Payments for RUC Capacity	
31.6 Timing of Day-Ahead Scheduling	
31.6.1 Criteria for Temporary Waiver of Timing Requirements	
31.6.2 Information to be Published on Secure Communication System	
31.6.3 Conditions Permitting CAISO to Abort Day-Ahead Market	
31.6.4 [Not Used]	
31.7 Extremely Long-Start Commitment Process	

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31.8 Constraints Enforced at Interties	
31.8.1 Scheduling Constraints	
31.8.2 Physical Flow Constraints	
32. [Not Used]	
33. [Not Used]	As noted, this Section will be used for the EDAM rules, similar to how Section 29 is used for EIM. Section 33 will be subject to Joint Authority.
34. Real-Time Market	<p>Joint (specifically where applicable to RTM/EIM) – Section 29 incorporates this section by reference for the provisions applicable to both RTM and EIM, which thus would be subject to Joint Authority. Section 29.34 also sets forth supplementary rules specific to the EIM participation in the Real-Time Market, which would also be Joint.</p> <p>Under EDAM, Joint Authority would also extend to any provisions in Section 34 that are applicable to both the Day-Ahead Market and EDAM. The new EDAM section of the tariff (Section 33) will identify those provisions, if any exist.</p>
34.1 Inputs to the Real-Time Market	
34.1.1 Day-Ahead Market Results as Inputs to the Real-Time Market	
34.1.2 Market Model and System Information	
34.1.3 Bids in the Real-Time Market	
34.1.4 Real-Time Validation of Schedules and Bids	
34.1.5 Mitigating Bids in the RTM	
34.1.6 Eligible Intermittent Resources Forecast	
34.2 The Hour-Ahead Scheduling Process	
34.2.1 The HASP Optimization	
34.2.2 Treatment of Self-Schedules in HASP	
34.2.3 Ancillary Services in the HASP and FMM	

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34.2.4 HASP Results	
34.2.5 Cessation of the HASP	
34.3 Real-Time Unit Commitment	
34.3.1 RTUC Optimization	
34.3.2 Commitment of Fast Start and Short Start Units	
34.3.3 [Not Used]	
34.4 Fifteen Minute Market	
34.4.1 Real-Time Ancillary Services Procurement	
34.5 Real-Time Dispatch	
34.5.1 Real-Time Economic Dispatch	
34.5.2 Real-Time Contingency Dispatch	
34.5.3 Real-Time Manual Dispatch	
34.6 Short-Term Unit Commitment	
34.7 General Dispatch Principles	
34.8 Dispatch Instructions to Units, Participating Loads, PDRs, and RDRRs	
34.9 Utilization of the Energy Bids	
34.9.1 [Not Used]	
34.9.2 [Not Used]	
34.9.3 [Not Used]	
34.9.4 [Not Used]	
34.10 Dispatch of Energy from Ancillary Services	
34.10.1 [Not Used]	
34.10.2 [Not Used]	
34.11 Exceptional Dispatch	
34.11.1 System Reliability Exceptional Dispatches	
34.11.2 Other Exceptional Dispatches	
34.11.3 Transmission-Related Modeling Limitations	
34.11.4 Reporting Requirements	
34.12 CAISO Market Adjustment to Non-Priced Quantities in the RTM	
34.12.1 Increasing Supply	
34.12.2 Decreasing Supply	
34.13 Means of Dispatch Communication	

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34.13.1 Response Required by Resources to Dispatch Instructions	
34.13.2 Failure to Conform to Dispatch Instructions	
34.14 Metered Subsystems	
34.14.1 [Not Used]	
34.15 Treatment of Resource Adequacy Capacity in the RTM	
34.15.1 [Not Used]	
34.15.2 [Not Used]	
34.15.3 [Not Used]	
34.15.4 [Not Used]	
34.15.5 [Not Used]	
34.15.6 [Not Used]	
34.16 Real-Time Activities in the Hour Prior to Settlement Period	
34.16.1 Confirm Interchange Transaction Schedules (ITs)	
34.16.2 [Not Used]	
34.16.3 [Not Used]	
34.17 Rules for Real-Time Dispatch of Imbalance Energy Resources	
34.17.1 Resource Constraints	
34.17.2 Calculation of Dispatch Operating Points After Instructions	
34.17.3 [Not Used]	
34.17.4 Inter-Hour Dispatch of Resources with Real-Time Energy Bids	
34.17.5 Inter-Hour Resources Dispatch without Real-Time Energy Bids	
34.17.6 Intra-Hour Exceptional Dispatches	
34.18 Ancillary Services in the Real-Time Market	
34.18.1 Dispatch of Self-Provided Ancillary Services	
34.18.2 Ancillary Services Requirements for RTM Dispatch	
34.19 Dispatch Information and Instructions	
34.19.1 Dispatch Information to be Supplied by the CAISO	
34.19.2 Dispatch Information to be Supplied by SC	
34.19.3 Dispatch Information to be Supplied by UDCs	
34.19.4 Dispatch Information to be Supplied by PTOs	

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34.19.5 Dispatch Information to be Supplied by Balancing Authorities	
34.20 Pricing Imbalance Energy	
34.20.1 General Principles	
34.20.2 Determining Real-Time LMPs	
34.21 Temporary Waiver of Timing Requirements for the RTM	
34.21.1 Criteria for Temporary Waiver	
34.21.2 Information to be Published on Secure Communication System	
34.22 Real-Time Dispatch of RDRRs	
34.22.1 Testing of RDRRs	
35. Market Validation and Price Correction	<p>Joint (specifically where applicable to RTM/EIM) – Section 29 incorporates this section by reference for the provisions applicable to both RTM and EIM.</p> <p>Under EDAM, Joint Authority would also extend to the provisions in Section 35 that are applicable to both the Day-Ahead Market and EDAM. The new EDAM section of the tariff (Section 33) will identify those provisions.</p>
35.1 Market Validation	
35.2 Timing of Price Correction Process	
35.3 Finality of Prices Subject to the Price Correction Process	
35.3.1 Price Corrections and Changes Pursuant to FERC Orders	
35.3.2 Processing and Publication Issues	
35.4 Scope of Price Corrections	
35.5 Price Correction Methodology	
35.6 Weekly Price Correction Report	
36. Congestion Revenue Rights	<p>N/A – Section 29 does not apply any of the rules in this section 36 to EIM.</p> <p>This stays the same for EDAM. <u>Note</u>: If EDAM in the future includes CRRs (as some have suggested), some</p>

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	or all of this Section may become subject to Joint Authority.
36.1 Overview of CRRs and Procurement of CRRs	
36.2 Types of CRR Instruments	
36.2.1 CRR Obligations	
36.2.2 CRR Options	
36.2.3 Point-To-Point CRRs	
36.2.4 [Not Used]	
36.2.5 Monthly CRRs	
36.2.6 Seasonal CRRs	
36.2.7 Long Term CRRs	
36.2.8 Limitations on Funding of CRRs	
36.3 CRR Specifications	
36.3.1 Quantity	
36.3.2 Term	
36.3.3 On-Peak and Off-Peak Specifications	
36.4 FNM for CRR Allocation and CRR Auction	
36.4.1 Adjustments to the FNM in Preparing the CRR FNM	
36.4.2 Simultaneous Feasibility	
36.4.3 Outages that may Affect CRR Revenue; Scheduling Requirements	
36.5 Candidate CRR Holder and CRR Holder Requirements	
36.5.1 Creditworthiness Requirements	
36.5.2 Required Training	
36.6 [Not Used]	
36.7 Bilateral CRR Transactions	
36.7.1 Transfer of CRRs	
36.7.2 Responsibility of the CAISO	
36.7.3 CRR Holder Reporting Requirement	
36.8 CRR Allocation	
36.8.1 Structure of the CRR Allocation Process	
36.8.2 Load Eligible for CRRs and Eligible CRR Sinks	
36.8.4 Eligible Sources for CRR Allocation	
36.8.5 Load Migration Between LSEs	

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36.8.6 Load Forecasts Used to Calculate CRR MW Eligibility	
36.8.7 Reconfiguration of CRRs	
36.9 CRR Allocation to OBAALSEs	
36.9.1 Showing of Legitimate Need	
36.9.2 Prepayment of Wheeling Access Charge	
36.9.3 CRR Eligible Quantities	
36.9.4 Eligible CRR Sources and Sinks	
36.9.5 Priority Nomination Process	
36.10 CRR Allocation to Merchant Transmission Subsystems	
36.11 CRR Allocation to Merchant Transmission Facilities	
36.11.1 Eligibility for Merchant Transmission CRRs	
36.11.2 Procedure for Allocating Merchant Transmission CRRs	
36.11.3 CRRs Allocated to a Transmission Facility Project Sponsor	
36.12 [Not Used]	
36.13 CRR Auction	
36.13.1 Scope of the CRR Auctions	
36.13.2 Responsibilities of the CAISO Prior to Each CRR Auction	
36.13.3 CRR Holder Creditworthiness	
36.13.4 Bids in the CRR	
36.13.5 Eligible Sources and Sinks for CRR Auction	
36.13.6 Clearing of the CRR Auction	
36.13.7 Announcement of CRR Auction Results	
36.14 CRR Implications of new IBAA's or Modifying Existing IBAA's	
36.14.1 Coordination of IBAA Changes with Release of CRRs	
36.14.2 Modification to CRR Settlement to Reflect IBAA Changes	
36.14.3 IBAA Change Impact on Adequacy of Previously-Released CRRs	
36.15 [Not Used]	
37. Rules of Conduct	Joint (Except for 37.2) – Section 29 applies all of the Section 37 Rules of Conduct to EIM, except Section 37.2. Thus, subsection 37.2 is not applicable and the

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	<p>other subsections of this Section are joint to the extent the provision applies to RTM/EIM.</p> <p>This stays the same for EDAM. Subsection 37.2 is not applicable and the other subsections of this Section are subject to Joint Authority to the extent the provision applies either to RTM/EIM or DAM/EDAM.</p>
37.1 Objectives, Definitions, and Scope	
37.1.1 Purpose	
37.1.2 Objectives	
37.1.3 Application of Other Remedies	
37.1.4 [Not Used]	
37.1.5 Administration	
37.2 Comply with Operating Instructions	
37.2.1 Compliance with Orders Generally	
37.2.2 [Not Used]	
37.2.3 Operations and Maintenance Practices	
37.2.4 Resource Adequacy Availability	
37.2.5 [Not Used]	
37.2.6 [Not Used]	
37.3 Submit Feasible Bids and Submissions to Self-Provide	
37.3.1 Bidding Generally	
37.3.2 Exceptions	
37.4 Comply with Available Reporting Requirements	
37.4.1 Reporting Availability	
37.4.2 Scheduling and Final Approval of Outages	
37.4.3 [Not Used]	
37.4.4 Enhancements and Exceptions	
37.5 Provide Factually Accurate Information	
37.5.1 [Not Used]	
37.5.2 Inaccurate or Late Actual SQMD	
37.6 Provide Information Required by CAISO Tariff	
37.6.1 Required Information Generally	
37.6.2 Investigation Information	

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37.6.3 Audit Materials	
37.6.4 Review by FERC	
37.7 [Not Used]	
37.8 Process for Investigation and Enforcement	
37.8.1 Purpose; Scope	
37.8.2 Referrals to FERC	
37.8.3 Investigation	
37.8.4 Notice	
37.8.5 Opportunity to Present Evidence	
37.8.6 Results of Investigation	
37.8.7 Statement of Findings and Conclusions	
37.8.8 [Not Used]	
37.8.9 Record of Investigation	
37.8.10 Review of Determination	
37.9 Administration of Sanctions	
37.9.1 Assessment, Waivers and Adjustments	
37.9.2 [Not Used]	
37.9.3 Settlement	
37.9.4 Disposition of Proceeds	
37.10 Miscellaneous	
37.10.1 Time Limitation	
37.10.2 No Limitation on other Rights	
37.11 Method for Calculating Penalties	
37.11.1 Inaccurate or Late Actual SQMD Penalty	
37.11.2 Inaccurate or Actual SQMD Penalty without Recalculation Settlement Statement	
38. Market Monitoring	<p>Note: Section 38 has no substantive language and instead points to Appendices O and P. See the discussion for these two Appendices below.</p> <p>This stays the same for EDAM.</p>

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<p>39. Market Power Mitigation Procedures</p>	<p>Joint for Subsection 39.7 Only – Section 29 applies only subsection 39.7 to EIM, so that subsection is subject to Joint Authority for any requirements applicable to EIM. The rest of Section 39 is not applicable. Section 29 also establishes (in Section 29.39) additional mitigation rules that are specific to EIM, which also would be Joint.</p> <p>The EDAM policy, as stated in the Revised Straw Proposal, contemplates that there will be provisions addressing local market power mitigation, as is the case for EIM. The tariff rules establishing this mitigation process will be subject Joint Authority. The market power mitigation procedures that do not apply to either EIM or EDAM will continue to be N/A.</p>
<p>39.1 Intent of CAISO Mitigation Measures; Additional FERC Filings</p>	
<p>39.2 Conditions for the Imposition of Mitigation Measures</p>	
<p>39.2.1 Conduct Inconsistent with Competitive Conduct</p>	
<p>39.3 Categories of Conduct that May Warrant Mitigation</p>	
<p>39.3.1 Conduct Regarding Bidding, Scheduling or Facility Operation</p>	
<p>39.3.2 Market Effects of Rules, Standards, Procedures, Other Items</p>	
<p>39.3.3 Using Different Prices in Other Markets as Appropriate</p>	
<p>39.3.4 Foregoing Category List Subject to Amendment as Appropriate</p>	
<p>39.4 Sanctions for Physical Withholding</p>	
<p>39.5 FERC-Ordered Measures</p>	
<p>39.6 Rules Limiting Certain Energy, AS, and RUC Bids</p>	
<p>39.6.1 Maximum Bid Prices</p>	
<p>39.7 Local Market Power Mitigation for Energy Bids</p>	
<p>39.7.1 Calculation of Default Energy Bids</p>	
<p>39.7.2 Competitive Path Designation</p>	
<p>39.7.3 Default Competitive Path Designations</p>	
<p>39.8 Eligibility for Bid Adder</p>	

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39.8.1 Bid Adder Eligibility Criteria	
39.8.2 New Generating Units	
39.8.3 Bid Adder Values	
39.9 CRR Monitoring and Affiliate Disclosure Requirements	
39.10 Mitigation of Exceptional Dispatches of Resources	
39.10.1 Measures for Resources Eligible for Supplemental Revenues	
39.10.2 Resources Not Eligible for Supplemental Revenues	
39.10.3 Eligibility for Supplemental Revenues	
39.10.4 Limitation on Supplemental Revenues	
39.10.5 Calculation of Exceptional Dispatch Supplemental Revenues	
39.11 Market Power Mitigation Applicable to Virtual Bidding	
39.11.1 Affiliate Disclosure Requirements	
39.11.2 Monitoring of Virtual Bidding Activity	
40. Resource Adequacy Demonstration for all SCs in the CAISO BAA	N/A – applicable only to CAISO BA; Section 29 does not incorporate any rules from this section. This stays the same for EDAM.
40.1 Applicability	
40.1.1 [Not Used]	
40.2 Information Requirements for Resource Adequacy Programs	
40.2.1 Requirements for CPUC Load Serving Entities	
40.2.2 Non-CPUC Load Serving Entities	
40.2.3 [Not Used]	
40.2.4 Load-Following MSS	
40.3 Local Capacity Area Resource Requirements for SCs for LSEs	
40.3.1 Local Capacity Technical Study	
40.3.2 Allocation of Local Capacity	
40.3.3 Procurement of Local Capacity Area Resources by LSEs	
40.3.4 [Not Used]	
40.4 General Requirements on Resource Adequacy Resources	

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40.4.1 Eligible Resources and Determination of Qualifying Capacity	
40.4.2 Net Qualifying Capacity Report	
40.4.3 General Qualifications for Supplying Net Qualifying Capacity	
40.4.4 Reductions for Testing	
40.4.5 Reductions for Performance Criteria	
40.4.6 Reductions for Deliverability	
40.4.7 Submission of Supply Plans	
40.5 [Not Used]	
40.5.1 [Not Used]	
40.5.2 [Not Used]	
40.5.3 [Not Used]	
40.5.4 [Not Used]	
40.5.5 [Not Used]	
40.6 Requirements for SCs and Resources for LSEs	
40.6.1 Day-Ahead Availability	
40.6.2 Real-Time Availability	
40.6.3 [Not Used]	
40.6.4 Availability Requirements for Resources with Operational Limitations that are not Qualified Use-Limits	
40.6.5 Additional Availability Requirements for System Resources	
40.6.6 Requirement for Partial Resource Adequacy Resources	
40.6.7 [Not Used]	
40.6.8 Use of Generated Bids	
40.6.9 Firm Liquidated Damages Contracts Requirements	
40.6.10 Exports of Energy from Resource Adequacy Capacity	
40.6.11 Curtailment of Exports in Emergency Situations	
40.6.12 Participating Load, PDRs, and RDRRs	
40.7 Compliance	
40.7.1 Other Compliance Issues	
40.7.2 Penalties for Non-Compliance	
40.8 CAISO Default Qualifying Capacity Criteria	

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40.8.1 Applicability	
40.9 Resource Adequacy Availability Incentive Mechanism	
40.9.1 Introduction to RAAIM	
40.9.2 Exemptions	
40.9.3 Availability Assessment	
40.9.4 Additional Rules on Calculating Monthly and Daily Average Availability	
40.9.5 Availability Standard	
40.9.6 Non-Availability Charges and Availability Incentive Payments	
40.9.7 Reporting	
40.10 Flexible RA Capacity	
40.10.1 Flexible Capacity Needs Assessment	
40.10.2 Allocation of Flexible Capacity Needs	
40.10.3 Flexible Capacity Categories	
40.10.4 Effective Flexible Capacity	
40.10.5 Flexible RA Capacity Plans	
40.10.6 Flexible RA Capacity Must-Offer Obligation	
41. Procurement of RMR Resources	N/A – applicable only to CAISO BA; Section 29 does not incorporate any rules from this Section. This stays the same for EDAM.
41.1 Procurement of Reliability Must-Run Resources by the CAISO	
41.2 Designation of Resources as Reliability Must-Run Resources	
41.2.1 Formal Withdrawal Notice Applicable to Generating Units	
41.2.2 Processing Retirement/Mothball Notices	
41.3 Reliability Studies and Determination of RMR Status	
41.4 Not Used	
41.5 RMR Dispatch	
41.5.1 Day-Ahead and RTM RMR Dispatch	
41.5.2 RMR Payments	
41.5.3 Provisions of Ancillary Services and other Reliability Services	

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41.6 [Not Used]	
41.7 Non-Availability Charges and Availability Incentive Payments	
41.8 Allocating Resource Adequacy Credits for RMR Designations	
41.9 Allocation of Reliability Must-Run Contract Costs	
41.9.1 [Not Used]	
42. Adequacy of Facilities to Meet Applicable Reliability Criteria	N/A – applicable only to CAISO BA; Section 29 does not incorporate any rules from this Section. This stays the same for EDAM.
42.1 Generation Planning Reserve Criteria	
42.1.1 <i>No Header</i>	
42.1.2 Applicable Reliability Criteria Met in Peak Demand	
42.1.3 Applicable Reliability Criteria Not Met in Peak Demand	
42.1.4 Lowest Cost Bids Satisfying Applicable Reliability Criteria	
42.1.5 CAISO to Take Necessary Steps to Ensure Criteria Compliance	
42.1.6 Long Term Forecast for Information Purposes	
42.1.7 Reliance on Market Forces to Maximize Possible Extent	
42.1.8 Allocation of Costs Incurred by CAISO in Trading Hour to SCs	
42.1.9 Costs for Difference in Schedules and Real-Time Deviations	
42.2 Transferred Frequency Response	
42.2.1 Procurement of Transferred Frequency Response	
42.2.2 Allocation of Transferred Frequency Response Costs Incurred	
43. [Not Used]	
43A. Capacity Procurement Mechanism	N/A – applicable only to CAISO BA; Section 29 does not incorporate any rules from this Section. This stays the same for EDAM.
43A.1 Applicability	

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43A.2 Capacity Procurement Mechanism Designation	
43A.2.1 SC Failure to Show Sufficient Local Capacity Area Resources	
43A.2.2 Collective Deficiency in Local Capacity Area Resources	
43A.2.3 SC Failure to Show Sufficient Resource Adequacy Resources	
43A.2.4 CPM Significant Events	
43A.2.5 Exceptional Dispatch CPM	
43A.2.6 [Not Used]	
43A.2.7 Cumulative Deficiency in Flexible RA Capacity	
43A.3 Terms of CPM Designation	
43A.3.1 SC Annual Plan Failure to Show Local Capacity Area Resources	
43A.3.2 SC Month Plan Failure to Show Local Capacity Area Resources	
43A.3.3 Annual Plan Collective LCA Resources Insufficient	
43A.3.4 SC Failure to Show Sufficient Resource Adequacy Resources	
43A.3.5 Term – CPM Significant Event	
43A.3.6 Term – Exceptional Dispatch CPM	
43A.3.7 [Not Used]	
43A.3.8 Term – Flexible Capacity CPM Designation	
43A.4 Selection of Eligible Capacity Under the CPM through Competitive Solicitation Processes (CSP) and General Eligibility Rules	
43A.4.1 Offer Rules to the CSPs	
43A.4.2 Administering the CSPs	
43A.4.3 Designation Amount.	
43A.5 Obligations of a Resource Designated Under the CPM	
43A.5.1 Availability Obligations.	
43A.5.2 Obligation to Provide Capacity and Termination	
43A.5.3 Availability Obligations for Simultaneous Designations.	
43A.5.4 Individualized Non-Availability Charges and Availability Incentive Payments	
43A.6 Reports	

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43A.6.1 CPM Designation Market Notice	
43A.6.2 Designation of a Resource Under the CPM	
43A.6.3 Non-Market and Repeated Market Commitment of Non-RA Capacity	
43A.6.4 Publication of Offers Submitted to the Competitive Solicitation Process	
43A.7 Payments to Capacity Designated Under the CPM	
43A.7.1 Calculation of Monthly CPM Capacity Payment	
43A.7.2 Payments for Overlapping CPM Designations to the Same Resource	
43A.7.3 Market Payments	
43A.8 Allocation of CPM Capacity Payment Costs	
43A.8.1 LSE Shortage of Local Capacity Area Resources in Annual Plan	
43A.8.2 LSE Shortage of Local Capacity Area Resources in Month Plan	
43A.8.3 Collective Deficiency in Local Capacity Area Resources	
43A.8.4 LSE Shortage of Demand or Reserve Margin Requirement in Plan	
43A.8.5 Allocation of CPM Significant Event Costs	
43A.8.6 Allocation of Exceptional Dispatch CPMs	
43A.8.7 [Not Used]	
43A.8.8 Allocation of Flexible Capacity CPM Costs	
43A.9 Crediting of CPM Capacity	
43A.10 [Not Used]	
44. Flexible Ramping Product	<p>Joint – Section 29 applies this Section to EIM and thus it is subject to Joint Authority.</p> <p>This stays the same for EDAM.</p>
44.1 In General.	
44.2 Uncertainty Awards	
44.2.1 Optimization.	
44.2.2 Variable Energy Resources.	
44.2.3 Eligibility for Uncertainty Award.	

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44.2.4 Determination of Uncertainty Requirement.	
44.3 Forecasted Movement	
44.3.1 Generally.	
44.3.2 RTD Forecasted Movement.	
44.3.3 FMM Forecasted Movement.	
Appendix A Master Definition Supplement	<p>Partially Joint – This Appendix defines all capitalized terms that appear in the Tariff. The definitions for all terms that apply to EIM would be Joint.</p> <p>Same approach for EDAM. The definitions for all terms that apply to EDAM would also be subject to Joint Authority.</p>
Appendix B Pro Forma Agreements	<p>Mostly N/A, because most of the pro-forma agreements apply only to the CAISO BA. The pro-forma agreements that apply to EIM would be subject to Joint Authority. They are identified below.</p> <p>Any new agreements required for EDAM participation would be subject to Joint Authority.</p>
Appendix B.1 Scheduling Coordinator Agreement	
Appendix B.2 Participating Generator Agreement	
Appendix B.3 Net Schedule Participating Generator Agreement	
Appendix B.4 Participating Load Agreement	
Appendix B.5 Dynamic Scheduling Agreement for Scheduling Coordinators	
Appendix B.6 MSA for Metered Entities (MSA CAISOME)	
Appendix B.7 Meter Service Agreement for Scheduling Coordinators	Joint
Appendix B.8 Utility Distribution Company Operating Agreement (UDCOA)	
Appendix B.9 Dynamic Scheduling Host Balancing Authority Operating Agreement (DSHBAA)	
Appendix B.10 Small Utility Distribution Company Operating Agreement (SUDCOA)	

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Appendix B.11 Congestion Revenue Rights (CRR) Entity Agreement	
Appendix B.12 Metered Subsystem (MSS) Entity Agent Agreement	
Appendix B.13 Resource-Specific System Resource Agreement	
Appendix B.14 Demand Response Provider Agreement (DRPA)	
Appendix B.15 Convergence Bidding Entity Agreement (CEBA)	
Appendix B.16 Pseudo-Tie Participating Generator Agreement (PPGA)	
Appendix B.17 Energy Imbalance Market Entity Agreement (EIMIA)	Joint
Appendix B.18 Energy Imbalance Market Scheduling Coordinator Agreement (EIMSCA)	Joint
Appendix B.19 Energy Imbalance Market Participating Resource Agreement (EIMPRA)	Joint
Appendix B. 20 Energy Imbalance Market Participating Resource Scheduling Coordinator Agreement (EIMPRSCA)	Joint
Appendix B.21 Distributed Energy Resource Provider Agreement (DERPA)	
Appendix B.22 Reliability Coordinator Services Agreement (RCSA)	
Appendix C Locational Marginal Price	Partially Joint – The LMP provisions that apply to EIM prices are Joint. The rest of the provisions in this Appendix are N/A. The same approach will apply for EDAM, meaning that any provisions that apply to EDAM will also be subject to Joint Authority.
Appendix D Black Start Generating Units	N/A – applies only to CAISO BA This stays the same for EDAM.
Appendix E Submitted Ancillary Services Data Verification	N/A – applies only to CAISO BA This stays the same for EDAM.
Appendix F Rate Schedules	N/A – EIM market participants are not charged these rates. They instead pay an EIM administrative charge

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	<p>that is calculated under the rules set forth in Section 29.11(i), which is subject to Joint Authority.</p> <p>Under EDAM, there will be an EDAM administrative charge that will be calculated as set forth in the new Section 33 for EDAM rules. This provision will be subject to Joint Authority. The rules in Appendix F will remain N/A.</p>
Appendix G Pro Forma Reliability Must-Run Contract	<p>N/A – applies only to CAISO BA</p> <p>This stays the same for EDAM.</p>
Appendix H Legacy Reliability Must-Run Contract CAISO Tariff Provisions	<p>N/A – applies only to CAISO BA</p> <p>This stays the same for EDAM.</p>
Appendix I Station Power Protocol	<p>N/A – applies only to CAISO BA</p> <p>This stays the same for EDAM.</p>
Appendix J Grandfathered Standard Capacity Product Provisions	<p>N/A – applies only to CAISO BA</p> <p>This stays the same for EDAM.</p>
Appendix K Ancillary Service Requirements Protocol (ASRP)	<p>N/A – applies only to CAISO BA</p> <p>This stays the same for EDAM.</p>
Appendix L Method to Assess Available Transfer Capability	<p>N/A – applies only to CAISO Controlled Grid/BA</p> <p>This stays the same for EDAM.</p>
Appendix M Dynamic Scheduling Protocol (DSP)	<p>N/A – applies only to CAISO BA</p>

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	This stays the same for EDAM.
Appendix N Pseudo-Tie Protocols	N/A – applies only to CAISO BA This stays the same for EDAM.
Appendix O CAISO Market Surveillance Committee	N/A because these are not market rules. If the straw proposal to change how MSC members are appointed is adopted, then Section 4.4 of Appendix O would amended and that provision would become subject to Joint Authority. This stays the same for EDAM. Note that the rule for how MSC members are appointed was added to the Charter for EIM Governance rather than the tariff. Thus, the reference to Section 4.4 above is inapplicable.
Appendix P CAISO Department of Market Monitoring	N/A because these are not market rules and generally are dictated by FERC regulations governing market monitoring. This stays the same for EDAM.
Appendix Q Eligible Intermittent Resource Protocol (EIRP)	N/A – applies only to CAISO BA This stays the same for EDAM.
Appendix R [Not Used]	N/A
Appendix S Small Generator Interconnection Procedures (SGIP)	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix T Small Generator Interconnection Agreement (SGIA) <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid

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	This stays the same for EDAM.
Appendix U Large Generator Interconnection Procedures (LGIP)	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix V Large Generator Interconnection Agreement (LGIA) <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix W Amendment No. 39 Interconnection Procedures	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix X Approved Project Sponsor Agreement (APSA) <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix Y Generator Interconnection Procedures (GIP) for Interconnection Requests	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix Z Large Generator Interconnection Agreement for Interconnection Requests Process Under the Generator Interconnection Procedures	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix AA Grandfathered Resource Adequacy Provisions for February 2018 to March 2018	N/A – applies only to CAISO BA This stays the same for EDAM.
Appendix BB Standard Large Generator Interconnection Agreement (LGIA) for Interconnection Requests in a Serial Study Group <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.

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Appendix CC Large Generator Interconnection Agreement (LGIA) for Interconnection Requests in a Queue Cluster Window <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix DD Generator Interconnection and Deliverability Allocation Procedures (GIDAP)	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix EE Large Generator Interconnection Agreement (LGIA) for Interconnection Requests Processed Under the Generator Interconnection and Deliverability Allocation Procedures (GIDAP) <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix FF Small Generator Interconnection Agreement (SGIA) for Interconnection Requests Processed Under the Generator Interconnection and Deliverability Allocation Procedures (GIDAP) <i>pro forma</i>	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix GG [Not Used]	N/A
Appendix HH Generator Interconnection Agreement Amendment Regarding Downsizing	N/A – applies only to CAISO Controlled Grid This stays the same for EDAM.
Appendix II Market-Based Rate Authority Suspension	N/A – applies only to CAISO BA This stays the same for EDAM.