

# Stakeholder Comments

## *2021 Draft Policy Initiatives Roadmap*

Submitted by	Company	Date Submitted
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Please accept the following comments submitted by Northern California Power Agency (NCPA) in response to CAISO’s 2021 Draft Policy Initiatives Roadmap dated September 30, 2020. In the Final 2021 Policy Initiatives Catalog, Section 5.8 states the Transmission Access Charge Structure Enhancements initiative’s draft final proposal is complete and on hold pending policy development of the Extended Day-Ahead Markets to EIM Entities (EDAM) initiative, to ensure the proposed policies have consistent treatment for transmission cost recovery. The CAISO also states that it anticipates presenting the Transmission Access Charge Structure Enhancements policy to the Board of Governors in Q3 2021.

On slide 8 of CAISO’s 2021 Draft Policy Initiatives Roadmap presentation, CAISO describes three (3) stages or bundles during which EDAM policy will be developed. More specifically, stage 1 (or bundle 1) of the EDAM policy development process will address the following topics: resource sufficiency evaluation, transmission provision and transfer/congestion revenue. Furthermore, on slide 23 of CAISO’s 2021 Draft Policy Initiatives Roadmap presentation, CAISO indicates that stage 1 of the EDAM policy development process will be conducted during Q1 2021. On slide 22 of CAISO’s 2021 Draft Policy Initiative Roadmap presentation, the Transmission Access Charge Structure Enhancements initiative is marked for implementation in Q4 2022.

NCPA seeks clarification regarding the proposed timing on which the Transmission Access Charge Structure Enhancements will be considered and implemented. Since the Transmission Access Charge Structure Enhancements policy may influence stage 1 of the EDAM policy development and vice versa (including policy related to transmission provision and cost allocation for EDAM transfers), it would seem appropriate to adjust the proposed schedule for implementation of the Transmission Access Charge Structure Enhancements initiative to be aligned with the proposed schedule for Stage 1 of EDAM policy development. NCPA requests CAISO consider the comments provided herein regarding the proper timing for implementation of the Transmission Access Charge Structure Enhancements initiative.