

## Background:

This document provides an opportunity for interested stakeholders to submit informal comments and perspectives on various topics discussed during the working group process. There is recognition that additional details are needed on these topics that will be developed throughout the initiative, and stakeholders will have opportunities to provide more comprehensive and formalized comments on these topics to the extent these become part of a formal proposal. Please be brief in any written responses to facilitate review, recognizing these represent informal reactions at this early stage.

Please submit your comments using this template to [ISOStakeholderAffairs@caiso.com](mailto:ISOStakeholderAffairs@caiso.com) by end of day March 15<sup>th</sup>, 2022.

## Question:

For each question please provide your perspectives on the concepts based on the information discussed in the working groups to date, recognizing that additional detail will be provided through the straw proposal that will allow you to consider the concepts in a more complete light. If desired, please provide additional context and/or identify additional aspects for consideration.

1. Please share your organizations perspective on the need for, and value of, a month ahead (45-day) advisory submission of a general resource plan by the EDAM Entity to provide some level of confidence in meeting day-ahead resource sufficiency throughout the month. (discussed 1.5 & 1.10)

***Portland General Electric Company (“PGE”) is not fundamentally opposed to a non-binding 45-day advisory of resource plans, but it remains unclear what need or value this kind of submission provides, who it’s being shared with, and in what format it’s being supplied? At a minimum, PGE opposes the sharing of resource plans with other load-serving entities and/or BAOs that are ultimately going to be competitors for the same supply (especially in a 45-day timeframe). As such, it would be beneficial for the CAISO to provide a better accounting of the benefit of this proposal and more detail around what information is to be shared and who will have access before we can (with any degree of confidence) support the concept.***

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2. Please share your organizations perspective on the nature of the consequences for failing to pass the Day Ahead resource sufficiency evaluation. Should the consequence be physical freezing of transfers, or a form of financial consequence? (discussed 2.23)

***The phrasing of this question assumes that only one type of consequence is appropriate or available, which seems contradictory given the conversations we have had during the working group about the benefit of creating optionality (where an entity could choose to take the physical freezing of imports if they fail, or, an entity could choose to take a penalty for any incremental transfer). This is particularly relevant given the fact that EIM entities located in the southwest have indicated that there is a lack of liquidity in the bilateral market whereas entities in the northwest have not experienced the same level of difficulty. PGE would support exploring optionality in the Straw Proposal, as opposed to exploring only financial consequences.***

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3. Please share your organizations perspective on whether there is merit to creating platform to facilitate intra-day, before the day-ahead market is run, trading of bid range and imbalance reserve capacity with between EDAM BAAs. (discussed 2.23)

***PGE supports exploring the creation of this platform option in more detail.***

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4. Please share your organizations perspective on whether a penalty structure needs to be developed to incent performance of firm energy contracts supporting imports (i.e., WSPP Schedule C arrangements) utilized to demonstrate resource sufficiency and sources from non-EDAM BAAs. (discussed 2.23)

***It's not clear to PGE how this could realistically be implemented, particularly under force majeure events or circumstances that prevent (or delay) a party's performance of its obligations under the contract.***

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5. Please share your organizations perspective on the Residual Unit Commitment (RUC) as an integral component of the EDAM framework based on the working group discussions to date. Should RUC be part of the EDAM? (discussed 2.25, 2.28)

***PGE has no comment at this time.***

6. Please share your organizations perspectives on convergence bidding (virtual bidding) as a feature of the EDAM based on the working group discussions to date. Should convergence bidding be a feature of the market, Day 1, at the start of EDAM? (discussed 2.25, 2.28)

***PGE has no comment at this time.***

7. Please share your organizations perspective on the topic of dependability of EDAM transfers. What is the level of confidence and/or priority that should be afforded to EDAM transfers relative to other transactions? (discussed in upcoming 3.9 meeting)

***If the resources were committed in the EDAM in the DA timeframe, those commitments should be honored in RT as well.***