



California ISO

Demand and Distributed Energy Market Integration (DDEMI): Policy Development

*Track 1: Draft Final Proposal:
End-Use Customer Exports in Demand Response Performance
Measurement*

Stakeholder Meeting
July 9, 2026

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Where are we in the process?



Objectives and Agenda

Objectives:

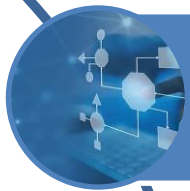
1. Share the Track 1: Draft Final Proposal: End-Use Customer Exports in Demand Response Performance Measurement
2. Hear clarifying questions and informal feedback from stakeholders that will help the CAISO understand stakeholder perspectives and that will assist stakeholders draft their written comments by **July 16, 2026** and that will help shape the Final Proposal

Agenda

Topic	Presenter	Time
I. Welcome and Introductions	Brenda Marquez	9:00-9:10 AM
II. Background	Anja Gilbert	9:10-9:20 AM
III. Stakeholder Feedback		9:20-9:50 AM
IV. Proposal and Key Additions: • Level of Export: Market vs. ISO BAA considerations • Net Energy Metering and Net Billing Tariff Participation • Baseline Adjustment Factors • Non-Participating Load		9:50-11:50
V. Timeline & Next Steps		11:50 - 12:00 PM

BACKGROUND

The ISO's near-term focus for market design in 2026: Demand and distributed energy market integration (DDEMI) initiative



End-user exports in demand response performance measurement

- Recognize end-user exports within an aggregation, while preserving demand response as a curtailment product.



Demand flexibility options for EDAM and WEIM entities

- Update market models for demand flexibility to better reflect WEIM and EDAM balancing authority areas, including the consideration of a new reliability-triggered demand response product.



Large load

- Explore if changes are needed to accommodate large load, reflected either as supply or demand.



Real-time demand side and pumped load bidding

- Convene a working group to explore real-time bidding constructs for flexible load and pumped storage resources.

Background: Relevant DDEMI working group problem statement

“While PDR is the most compatible CAISO model for behind-the-meter interconnected storage, because it is conceptualized as load curtailment, it does not include any measured export of energy from individual locations to measure performance of the resource via any of existing PEMs—including metering generator output methodology—so that behind-the-meter storage aggregations cannot offer the full resource capability, and PDR performance is artificially capped at levels reflecting conservative estimates of site load, resulting in significant energy from behind-the-meter storage that is unused during events and unavailable to the CAISO market.”

What is DDEMI Track 1 Proposing?

This proposal would allow the performance of a demand response aggregation to include behind-the-meter exports from utility-authorized end-use customers, provided the resource does not net export.

Background: Terminology

One demand response resource is made up of many end-users.

End-user synonyms

Retail customer
Site
Location
Service account
Local regulatory authority-approved load meter
End-use customer

End User: A consumer of electric power who consumes such power to satisfy a Load directly connected to the ISO Controlled Grid, a Distribution System... and who does not resell the power

ISO Tariff, Appx A

Resource synonyms

Demand response Aggregation*
Resource ID
Proxy Demand Resource Aggregation
Reliability Demand Response Resource Aggregation



**Limited to one sub-load aggregation point (LAP)*

Background: Terminology - metering

- ISO demand response relies on accurate **metering** of demand response resources to determine how much load is reduced during a dispatch event.
 - This metered data feeds into **demand response energy measurement**, which calculates delivered load reduction by comparing **actual customer load during dispatch** against a historical **baseline**.
 - The **performance evaluation methodology** governs how this comparison is performed, ensuring consistency and accuracy in measuring performance.
- Together, these elements establish the ISO's framework for quantifying, validating, and settling demand response.
 - This links real-time customer load behavior to market participation and compensation.

How do things work today?

Today, if a customer in a demand response aggregation is net exporting (e.g., rooftop solar + battery), their retail load meter data is:

- “Zeroed out” on an individual customer basis.
- Applied regardless of whether the customer is certified to export energy onto the distribution grid.

Today’s rules: illustrative aggregated resource-level demand response energy measurement calculation examples

End-use customer	1	2	3	4	Aggregate Resource Total
Baseline value	2.0 kW	2.0 kW	2.0 kW	2.0 kW	8.0 kW
Actual load during dispatch	1 kW	0.0 kW	-3.0 kW	-3.0 kW	-6 kW
Zeroed out load during dispatch	N/A	N/A	0 kW	0 kW	
DR Energy Measurement	1 kW	2.0 kW	2.0 kW	2.0 kW	7 kW

Proposed change

Stakeholders are considering a proposal for a new “floor” limiting exports at the level of the demand response aggregation, instead of the end use customer.

- Ensures demand response resources continue to represent demand curtailment in a way that corresponds to market topology.
- Ensures that demand response in ISO markets remains a load curtailment function at the market resource level, while capturing the contributions of individual customers with behind-the-meter storage or generation to the aggregated load curtailment.

Proposed change: illustrative aggregated resource-level demand response energy measurement calculation examples

End-use customer	1	2	3	4	Aggregate Resource Total
Baseline value	2.0 kW	2.0 kW	2.0 kW	2.0 kW	8.0 kW
<i>Actual load during dispatch</i>	<i>1 kW</i>	<i>0.0 kW</i>	<i>-3.0 kW</i>	<i>-3.0 kW</i>	<i>-5 kW</i>
<i>Uncapped DREM</i>	<i>1 kW</i>	<i>2.0 kW</i>	<i>5.0 kW</i>	<i>5.0 kW</i>	<i>13 kW</i>
Capped DREM					8.0 kW

DDEMI Working Group Guiding Principles

These guiding principles, developed in the DDEMI working group, will help facilitate the assessment of solutions and weigh the potential tradeoffs between approaches:

1. **Efficiency**

- Market optimization produced least cost results while maintaining reliability.

2. **Competition**

- Market rules expand competition to the benefit of consumers and allow flexible demand and smaller-scale resources to participate like conventional, large-scale generators.

3. **Feasibility**

- Operationally feasible; the market solution can be solved within prescribed timelines
- Feasible implementation.

4. **Simplicity**

- Market design elements are not overly complicated

5. **Reliability/Compliance**

- Reliability and compliance standards are reflected in market design

6. **Facilitate state level public policies**, to the extent practicable

Scope of Proposal

Topic	What the Proposal Does
Eligible BAAs	Applies to all BAAs*
Eligible Market Models	Proxy Demand Resource (PDR) Reliability Demand Response Resource (RDRR)
Eligible Customers: Subject to UDC Interconnection Review	Requires UDC review of which customers are eligible to export through the existing registration process in the ISO's Demand Response Registration System (DRRS)
Performance Evaluation Methodologies (PEMs)	Applies the proposal across all PEMs
Scheduling Coordinator (SC) Responsibilities	SCs are responsible for determining how export adjustments are allocated among customers within an aggregation
Baselines	Clarifies that export behavior should remain embedded in baseline calculations to ensure only incremental performance is compensated
Deliverability	Preserves existing deliverability assumptions and frameworks for the ISO BAA. Other BAAs may make their own determination.

*Enabling participation contingent on future tariff changes as discussed in Track 2

DDEMI Working Group Principles applied to DDEMI Track 1

Competition

Better reflects BTM storage and DER capabilities within existing DR models

Efficiency

Improves settlement accuracy by better reflecting actual customer behavior
Continues to compensate only incremental performance provided in response to ISO dispatch

Simplicity/Feasibility

Enhances existing PDR and RDRR models rather than creating a new resource category
Leverages existing PEMs, DRRS processes, and SC responsibilities

Reliability/Compliance

Preserves existing market and reliability frameworks
Preserves ISO BAA deliverability assumptions

Facilitate State Goals

Applies consistently across ISO-administered markets, including WEIM and EDAM
Respects BAA-specific requirements for deliverability, RA, and interconnection

STAKEHOLDER FEEDBACK

Overall Feedback and Areas of Support

Overall

- Broad support for advancing Track 1 as an incremental reform; no stakeholder opposed the proposal outright
- Most commenters supported recognizing end-user exports while maintaining demand response as a load-curtailement product

Broad Areas of Support

- **All PEMs:** Advanced Energy United, CalCCA, CALSSA, MCE, PG&E, Sunrun, Joint DR Parties, VGIC, Voltus.
- **UDC-approved exports only:** Advanced Energy United, CALSSA, MCE, PG&E, Sunrun, VGIC, Voltus.
 - Exception: SCE recommends CAISO track the level of export authorized tracked, and the ISO to monitor and validate that bids reflect these authorized levels
- **PDR and RDRR applicability:** Advanced Energy United, Joint DR Parties, PG&E, Sunrun, VGIC, Voltus.
 - Exception: CPUC ED recommended deferring RDRR
- **SC determines which customers are zeroed out:** Advanced Energy United, CalCCA, CALSSA, MCE, PG&E, Sunrun, Joint DR Parties, VGIC, Voltus

Net Energy Metering and Net Billing Tariff Participation

- Concern: Net Energy Metering and Net Billing Tariff customers may receive both retail and wholesale compensation for the same exports
- Exclude or Limit Net Energy Metering and Net Billing Tariff Participation
 - CPUC Energy Division
 - Recommended excluding Net Energy Metering and Net Billing Tariff customers, until double compensation issues are addressed
 - Suggested implementation in 2028
 - Public Advocates Office: Recommended excluding Net Energy Metering and Net Billing Tariff customers due to double-compensation concerns
- IOUs echoed the CPUC's concern and also: sought resolution before implementation (PG&E), requested explicit guardrails (SCE), and requested additional examples (SCE)
- Support Continued Eligibility
 - Tesla: Requested confirmation of Net Energy Metering and Net Billing Tariff customers eligibility
 - CalCCA: Warned that excluding these customers could strand already deployed capacity

Settlement, Baselines, and Market Integrity

Baselines/Settlements

- CPUC ED: Recommended capping adjustment factors at 1.0
- IOUs: Requested more details on baseline adjustment factors
- DMM: Generally recommended continued baseline improvements and further evaluation of control-group methodologies
- SCE: Redline BPM with examples, standardized baseline and performance methodologies along with validating, monitoring , and auditing SC calculations

Non-Responsive Load / Market Integrity

- CPUC ED, Public Advocate Office, SCE: Implement safeguards
- PG&E and DMM: Monitor
- Sunrun: Argued that prohibiting resource-level exports creates an incentive to enroll non-responsive load solely to absorb exports
- DMM: Coordinate with LRAs to make sure that QCs aren't inflated

Miscellaneous

- **RA:**
 - SDG&E: Concerned exports could effectively count toward RA value and requested coordination with the CEC regarding RA forecasting impacts
 - DMM: Warned QC could be overstated if aggregations rely on non-responsive load and recommended coordination with LRAs to ensure QC reflects actual capability
- **Prohibited Resources:**
 - CPUC ED: Clarify that end-user exports must comply with the CPUC prohibited-resource policy
- **Registration Process:**
 - MCE: Ease resource registration processes when customer composition changes

Future Requests

Future Topic	Stakeholders
Allow exports beyond Resource ID up to sub-LAP	Advanced Energy United, CALSSA, Sunrun, Joint DR Parties, Tesla, VGIC, Voltus
Deliverability reform	Advanced Energy United, CalCCA, Sunrun, Joint DR Parties, Tesla, VGIC, Voltus
Device-level metering	CALSSA, Sunrun, Joint DR Parties, Tesla, Voltus
Enrollment / registration reform	Sunrun, MCE
Capacity accreditation for exports	Voltus
Device telemetry	Tesla
Enhanced monitoring data available	DMM

PROPOSAL AND NEW ADDITIONS

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*Enabling participation contingent on future tariff changes as discussed in Track 2

Scope of Proposal: new elements introduced in the draft final proposal

Topic	What the Proposal Does	What's New
ISO Resource ID exports	Clarifies market-wide vs. BAA specific considerations with the level of export	Adds the market-wide considerations and future DDEMI evolution
Net Energy Metering and Net Billing Tariff Participation	Allows Net Energy Metering and Net Billing Tariff customers to participate	Responds directly to stakeholder concerns and explicitly concludes that retail export compensation and wholesale DR compensation are different services; Net Energy Metering and Net Billing Tariff customers remain eligible
Settlements: Pre-Event Baseline Adjustment Factors	Updates baseline adjustment factors so they do not produce negative or undefined results	Introduces the issue and a hierarchical methodology: (1) current method, (2) exclude export intervals if needed, (3) default to 1.0 if no valid intervals remain
Non-Responsive Load	Explains the issue and responds to stakeholder concerns	Responds to stakeholder concerns and declines to establish new responsiveness requirements or aggregation-design standards

Roles and Responsibilities Under DDEMI Track 1

Role	Responsibilities
Scheduling Coordinators	• Calculate and submit settlement-quality meter data and monitoring data • Apply the resource-level export limit at the aggregation level • Determine how export-limit adjustments are allocated among customers within an aggregation • Ensure all data submitted to the ISO is true, accurate, and consistent with tariff requirements • Apply baseline adjustment-factor methodology
Demand Response Providers	• Submit PEMs form • Ensure resource information accurately reflects operational and technical characteristics • Enroll customers with appropriate export authorizations • Comply with ISO participation, metering, bidding, and performance requirements • Support settlement calculations under applicable PEMs
Utility Distribution Companies	• Review and approve/reject customer registrations through DRRS • Verify export interconnection authorization and registered export capability • Establish and enforce interconnection requirements and export limits • May remove customers from DR resources if interconnection requirements are violated (during review in DRRS, after review it would be on a case-by-case basis outside DRRS)
Load Serving Entities	• Review registration information and provide comments regarding accuracy • May remove customers from DR resources under existing processes where appropriate (during review in DRRS, after review it would be on a case-by-case basis outside DRRS)
End-Use Customers	• Obtain and maintain authorized export interconnections where exports will be recognized • Operate consistent with utility tariffs, interconnection agreements, operating procedures, and export limits

Resource-level exports: Some stakeholders would like the ISO to go further

Some stakeholders propose that DR should evolve to allow exports beyond the resource ID

Market Perspective on Net Export Beyond Resource-Level: Why Aggregation-Level Exports Present a New Modeling Challenge

Current Design

- Demand response aggregations are modeled as load within a sub-LAP
- For network analysis, sub-LAP load is allocated across individual PNodes using load distribution factors (LDFs)
- This approach is appropriate when the resource is represented as aggregated load

Challenge with Net Exports

- Allowing a geographically dispersed aggregation to become a net exporter changes the modeling problem
- Existing load distribution assumptions may not accurately represent where exports are actually injected into the grid
- As exports become a larger share of resource performance, these differences become increasingly important

Market Perspective on Net Export Beyond Resource-Level: Why Location Matters

Potential Market and Reliability Impacts

- If exports are modeled using assumptions developed for load, differences between modeled and actual injection locations could affect:
- Congestion management
- Power flow modeling
- Locational marginal prices (LMPs)
- Dispatch outcomes
- Settlement accuracy

Market Perspective on Net Export Beyond Resource-Level: Potential Future Enhancements

Supporting exports beyond the Resource ID may require, among other things:

- Policy discussions, in a future DDEMI Track
- Additional visibility into export locations at individual PNodes
- Enhancements to the Full Network Model (FNM)
- Revised resource modeling constructs for distributed injections

ISO BAA Perspective on Net Export Beyond Resource-Level

Separately, within the ISO BAA, allowing exports beyond a resource's own registered load raises transmission planning and deliverability considerations.

- The ISO BAA is not allowing exports beyond:
 - A resource's own load, or
 - Sub-LAP load
- Rationale:
 - Additional exports beyond a resource's own load rely on general load already used by others
 - Could reduce deliverability for existing resources

Policy implication:

- DR (PDR/RDRR) must:
 - Remain load curtailment-only at resource level
- To export beyond load:
 - Must obtain deliverability by entering generator interconnection queue
 - Obtain transmission planning deliverability (TPD) allocation

Net Energy Metering and Net Billing Tariff Participation: Double Compensation Concerns

- The CPUC Energy Division staff notes that:
 - The net billing tariff compensates exported energy using avoided-cost values, which includes an avoided energy cost. This payment is not just for planning but also to reflect expected operations.
- As a result, the same exported energy would receive: 1.) a payment through the retail tariff; and 2.) a second payment through the ISO wholesale market.
- They recommend
 - Excluding Net Energy Metering and Net Billing Tariff customers from the initial implementation until double-compensation concerns are resolved
 - Delaying implementation
- The IOUs and Cal Advocates similarly recommend addressing double compensation concerns.

Net Energy Metering and Net Billing Tariff Participation: The ISO's Perspective

Wholesale market compensation as payment for a distinct service for access to incremental energy, which would be otherwise unavailable absent ISO dispatch.

Net billing tariff	ISO wholesale market
Administrative avoided-cost payment	Market-based payment
Compensates exported energy	Compensates for incremental service provided based on least cost dispatch
Based on tariff methodology	Based on performance during dispatch
Not tied to ISO dispatch	Triggered by market awards as a result of being the least-cost resource

The CPUC's net energy metering and net billing tariff provide a retail bill credit for the value of exported energy, while the ISO compensates the delivery of measurable, incremental, and dispatchable wholesale market service.

Baseline Adjustment Factor: Key Concepts

Purpose

- Adjusts the historical baseline to better reflect a customer's actual operating conditions on the event day
- Helps ensure demand response compensation is based on incremental performance resulting from ISO dispatch, rather than pre-existing changes in customer load

Current Methodology

- Calculated as the ratio of the customer's average load during the pre-event adjustment period to the corresponding historical baseline-period load
- Adjustment Factor = average load in pre-event period/average baseline load for same hours
- Only applied to certain baselines to produce an adjusted event-day baseline

Adjustment Factor Limits

- Existing tariff limits continue to apply
- Adjustment factors are capped between **0.80 and 1.20**, limiting baseline adjustments to **±20%** of the historical baseline
- These limits help prevent extreme adjustments and maintain settlement stability

Why Adjustment Factors Matter

- Accounts for differences between historical conditions and actual event-day conditions
- Improves settlement accuracy by reducing over or under-statement of DR performance

Baseline Adjustment Factor: Track 1 Consideration

- Customer exports from behind-the-meter batteries and other DERs can create negative-load intervals during the pre-event period
- These export intervals can produce undefined, negative, or otherwise non-representative adjustment factors
- Track 1 proposes a targeted refinement to preserve the existing methodology while ensuring mathematically valid adjustment factors
- Track 1 does not change the underlying baseline methodology, adjustment period, or existing $\pm 20\%$ adjustment-factor limits. It only modifies the treatment of export intervals when necessary to produce a valid and representative adjustment factor.

Baseline Adjustment Factor: Today

	Average Net Load from the Historical Baseline Period (kW)	Event Day (kW)
Average pre-event load	100	90

- Adjustment Factor = $90 \div 100 = 0.90$
- If the historical event baseline is 500 kWh, the adjusted baseline becomes:
 $500 \text{ kWh} \times 0.90 = 450 \text{ kWh}$
- This reflects that the customer's operating conditions immediately before dispatch were approximately 10% lower than during the historical baseline period.
- This adjustment helps ensure DR compensation reflects load reductions caused by the dispatch event rather than lower consumption that already existed before the event; without the adjustment, performance would be overstated by 50 kWh.

Baseline Adjustment Factor: Challenge Introduced by behind-the-meter exports

- Under the Track 1 proposal, a customer's expected operating behavior may include battery exports, shown as negative load at the customer meter, during the pre-event adjustment period.

	Average Net Load from the Historical Baseline Period	Event Day (kW)
Average pre-event net load	-15	60

- Adjustment Factor = $60 \div (-15) = -4.0$
- Applying a negative adjustment factor would invert the customer's historical baseline and produce a result that is not representative of expected operating behavior.
- Similarly, if the historical pre-event average net load equals zero (e.g., imports and exports offset), the adjustment factor becomes undefined due to division by zero.

Baseline Adjustment Factors: Hierarchical Approach

- **Step 1:** Apply the existing adjustment-factor methodology.
- **Step 2:**
 - If: Application of the existing methodology results in an undefined adjustment factor, a negative adjustment factor, or another mathematically anomalous result due to net-export intervals, exclude settlement intervals with net exports from the calculation of the average pre-event load
 - Then: Recalculate the adjustment factor using the remaining qualifying settlement intervals, provided the remaining data satisfy existing baseline data sufficiency requirements.
- **Step 3:** If the remaining data do not satisfy existing baseline data sufficiency requirements, use an adjustment factor of 1.0

Baseline Adjustment Factor: Step 1: Apply Existing Methodology

- SCs will first apply the existing pre-event adjustment factor methodology using all available pre-event intervals, consistent with current tariff rules and baseline constructs (e.g., 10-in-10, 5-in-10, etc.)
- If the resulting adjustment factor is mathematically valid and representative of expected operating conditions, no further action is required.
- If the result is negative or undefined, move to step 2.

Baseline Adjustment Factor: Step 2: Exclude Export Intervals

If the Step 1 produces an undefined, negative, or otherwise non-representative adjustment factor due to export behavior, net export intervals are excluded and the adjustment factor is recalculated using the remaining qualifying settlement intervals, provided the remaining data satisfy existing baseline data sufficiency requirements.

Example: Mixed Import and Export Intervals

Settlement Interval (within the pre- event adjustment period)	Historical Baseline (kW)	Event Day (kW)
1	-20 (export)	-15 (export)
2	40 (import)	50 (import)
3	60 (import)	66 (import)

Adjustment Factor = $(50 + 66) \div (40 + 60) = 116 \div 100 = 1.16$

If these conditions are not met, move to to Step 3.

Baseline Adjustment Factor: Step 3:

If there is insufficient data, default to an adjustment factor of 1.0

If the remaining qualifying settlement intervals do not satisfy the existing baseline data sufficiency requirements after excluding export intervals, the adjustment factor shall default to 1.0.

Example: All Intervals Are Exports and No Valid Data Remains

Settlement Interval (within the pre-event adjustment period)	Historical Baseline (kW)	Event Day (kW)
1	-10	-15
2	-20	-25
3	-5	-10

The tariff-prescribed adjustment factor cannot be calculated because no representative average load exists. Applying an adjustment factor of 1.0 preserves the historical baseline without introducing arbitrary proxy values.

Baseline Adjustment Factors: Why the ISO Chose This Approach

- Preserves existing methodology
- Uses customer-specific data
- Avoids mathematically invalid results
- Maintains settlement accuracy
- Limited implementation complexity
- Preserves existing 0.80–1.20 cap

Non-Responsive Load

Some stakeholders have questioned if this proposal creates an incentive to enroll non-responsive load

	Before dispatch	During Dispatch
Resource QC (A&B)	10 MW	10 MW
Customer A	5 MW load	5 MW load; no load reduction
Customer B	5 MW load curtailment + 5 MW battery	Load curtailed to 0 MW + Battery exports 5 MW
Baseline load	10 MW	10 MW
Net Load	N/A	0 MW
Measured Performance	N/A	10 MW (= 10 - 0)

ISO Response

- **Performance-based construct unchanged:** CAISO only compensates for demonstrated performance; resources must produce measurable deviation from baseline. Non-performance does not result in compensation.
- **No incentive for non-responsive load:** Non-responsive load by definition is not performing
- **RAAIM accountability remains:** To the extent they are subject to RAAIM, non-performance penalties under RAAIM will continue to apply regardless of enrollment composition
- **No change to qualification or counting rules:** Existing LRA/LSE frameworks continue to determine eligible resource types (i.e., is non-responsive load able to enroll in programs?) and capacity counting (i.e., what is the capacity value for non-responsive load?)

Draft Timeline and Next Steps

- July 9: Stakeholder meeting on Draft Final Proposal
- July 16: Stakeholder Comments Due on Draft Final Proposal
- July 22: CAISO aims to publish the Final Proposal
- August 25-26: DDEMI Track 1 vote at Board Meeting

Aiming for 2027 implementation

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GUESTS:
DR. BEN HOBBS AND SCOTT HARVEY

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06/16/2026



Story | Operations, Inside the California ISO

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This new periodical offers concise and accessible insights into notable developments across the western power markets. [Read the first issue](#) for highlights on market performance during the first weeks of Extended Day-Ahead Market (EDAM) operations.

The document will be posted on the [EDAM Overview page of WesternEnergyMarkets.com](#) website.

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2026 STAKEHOLDER SYMPOSIUM

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at Kimpton Sawyer Hotel, Sacramento, CA

Symposium program - Oct. 6
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