



Response to Stakeholder Comments Tariff Clarifications Spring 2025

On March 19, 2025, the California ISO published draft tariff changes to tariff sections 30.5.1 that proposed to require scheduling coordinators for a variable energy resource to self-schedule during the period of time that a resource reaches commercial operation and the time it has developed a state of the art forecast as required by Appendix Q of the ISO tariff. The use of a self-schedule will eliminate the potential for unwarranted bid cost recovery that might accrue to a variable energy resource from the submission of a bid that clears the fifteen minute market but that does not reasonably reflect the forecasted output of the resource. Under this scenario, the resource would receive an instruction to reduce its fifteen minute market schedule in the five minute real-time dispatch based on its latest telemetered output. The potential for bid cost recovery arises from the difference between megawatts (MW) cleared in the fifteen-minute market that is greater than the MW output the resource can actually provide in the real-time dispatch.

Current market rules provide that the ISO will use a state of the art forecast administered either by the ISO or the resource itself to establish a variable energy resource's upper economic limit for purposes of submitting economic bids. (See ISO tariff section 34.1.6.) The proposed tariff changes address the gap between the time a resource reaches commercial operations and the time it establishes a state of the art forecast to support economic bidding.

Based on stakeholder feedback, the ISO plans to withdraw this proposed change from its current tariff clarification initiative. Separately, the ISO has discussed similar changes in the context of a change to its Business Practice Manual for Market Operations (See Proposed Revision Request 1610 - [BPM CM - View PRR Details](#)). The ISO will withdraw that Proposed Revision Request and may issue a new Proposed Revision Request in the context of its Business Practice Manual change management process to provide additional guidance to scheduling coordinators. The ISO reminds scheduling coordinators that submitted bids must reflect resource MW levels that are reasonably expected to be available and capable of performing at the levels specified in the bid, and to remain available and capable of so performing based on all information that is known or should have been known at the time of submission.

Scheduling coordinators for variable energy resources with questions about the process and requirements to develop a state of the art forecast administered by the ISO or by the resource itself should consult with Appendix A of the ISO's Business Practice Manual Operations, the ISO's new resource implementation process, and their client representative.