

February 26, 2020

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RE: UAMPS Comments on Extended Day-Ahead Market Technical Workshop

1. In relation to the proposed day ahead trading timeline. Can the EIM entities shed more light on how the OATT sales will be temporarily put on hold while the EDAM market is run and then resumed once the market run is over? We have some concerns with how this will work but can't give complete comments or concerns until more detail is given.
2. Can the EIM entities clarify their expectations as to how a 24-hour non-binding RS test will run? How will renewable capacity be valued and for what hours (solar)? Will the RS test be a boiler plate pass/fail test, or will it be more specific to regional expectations for renewables/hydro conditions, etc?
3. What is the overall feeling of the EIM entities that they will allow the CAISO to work with transmission customers directly in regard to EDAM? If the feeling is a direct contract between transmission customers and the CAISO, could that then apply to EIM as well?
4. We are of the understanding that each transmission customer will be responsible for submitting their available Bucket 1,2, and 3 transmission for the EDAM. If this is the case, can the EIM entities clarify how they plan to show how they will be Resource Sufficient as a BAA while also carving out their transmission customers within their BAA? This would also be the case for external resources being exported/imported to/from individual BAAs.
5. We would like clarification on how EIM entities will work to be consistent in valuing transmission owned by third party TOPs within their BAAs, especially when it is expected to help optimization.
6. We are strongly opposed to a 50/50 share of congestion rents within CAISO for EIM entities who bring available transmission to certain congested paths, as proposed by Powerex. We believe this will put CAISO in a weak position as the Market Operator and give EIM entities an unfair competitive advantage in how they offer transmission and where. We also feel that if benefits are given in one direction, they must be given in the other direction, which then allows the CAISO to have full congestion rent benefits in the EIM Entities' BAA.