

Stakeholder Comments Template

Day-Ahead Market Enhancements Phase 1 Initiative

This template has been created for submission of stakeholder comments on the third revised straw proposal that was published on February 28, 2019. The proposal, Stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

http://www.caiso.com/informed/Pages/StakeholderProcesses/Day-AheadMarketEnhancements.aspx

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on March 21, 2019.

Submitted by	Organization	Date Submitted
Danielle Osborn Mills	AWEA-California	3/21/2019

Please provide your organization's comments on the following issues and questions.

1. Fifteen-Minute Granularity Design Features

Please provide your organization's feedback on the fifteen-minute scheduling granularity features topic as described in section 2 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the fifteen-minute scheduling granularity features topic as described in section 2 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Optional: Include additional subtopics or specific questions on this topic as needed

2. Fifteen-Minute Granularity Impacts to the Energy Imbalance Market

Please provide your organization's feedback on the Fifteen-Minute Granularity Impacts to the Energy Imbalance Market topic as described in section 3 of the proposal. Please explain your rationale and include examples if applicable.

AWEA-California generally supports the 15-minute scheduling proposal from the Day-Ahead Market Enhancements Phase 1 proposal. As part of the proposal, EIM base schedules would change from hourly granularity to 15-minute granularity. At least some of the EIM tariffs define base schedules as **hourly** forward schedules. Therefore, there may be a need to update the tariffs of the EIM Entities as a result of this change. Given the impacts of the change to 15-minute scheduling in the day-ahead market on EIM Entities and generators in those areas, AWEA-California would appreciate a technical conference/workshop with the EIM Entities where the settlement impacts, especially for Non-Participating Resources would be discussed and reviewed. Given the impacts to the EIM and resources located within EIM Entity areas, we request that the CAISO, in conjunction with the EIM Entities, hold a technical conference or workshop to review the changes that would be required within EIM Entity tariffs, business practices, and settlements as a result of the implementation of 15-minute schedules in the day-ahead market and for use in EIM Base Schedules.

Please provide your organization's position on the Fifteen-Minute Granularity Impacts to the Energy Imbalance Market topic as described in section 3 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Optional: Include additional subtopics or specific questions on this topic as needed

3. Energy Imbalance Market Governing Body Role

Please provide your organization's feedback on the EIM Governing Body Role as described in section 4 of the proposal. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the EIM Governing Body Role as described in section 4 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Additional comments

Please offer any other feedback your organization would like to provide on the Day-Ahead Market Enhancements Phase 1 initiative third revised straw proposal.