



Stakeholder Comments Template

Day-Ahead Market Enhancements Phase 2 Initiative

This template has been created for submission of stakeholder comments on the issue paper and straw proposal that was published on February 28, 2019. The paper/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 |
|---|--|-----------------|
| <i>Mike Whitney</i> mike.whitney@ncpa.com (916) 781-4205 | <i>Northern California Power Agency (NCPA)</i> | <i>4/8/2019</i> |

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

NCPA appreciates the opportunity to comment on this issue paper/straw proposal. We reiterate our 3/23/2019 comment on DAME Phase 1 Third Revised Straw Proposal that CAISO ensure adequate implementation timelines for planning, testing, and implementing the major design changes being proposed in this initiative.

1. Proposed Day-Ahead Market Structure

Please provide your organization’s feedback on the proposed day-ahead market structure topic as described in section 3 of the proposal. Please explain your rationale and include examples if applicable.

NCPA has no comment at this time.

Please provide your organization’s position on the proposed day-ahead market structure topic as described in section 3 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

NCPA has no comment at this time.

2. Day-Ahead Flexible Ramping Product

Please provide your organization's feedback on the Day-Ahead Flexible Ramping Product as described in section 4 of the proposal. Please explain your rationale and include examples if applicable.

NCPA urges CAISO to consider how the proposed changes in this initiative will interact with the significant design changes being proposed in other initiatives. For example, in this initiative, CAISO proposes that all RA resources be required to bid \$0/MWh for the Day-Ahead Flexible Ramping Product. CAISO is simultaneously proposing, in a separate initiative, to overhaul the RA framework. Without further analysis of the interaction between those two separate initiatives, combining the initiatives could result in unintended consequences.

For example, if CAISO maintains its proposal to require RA resources to bid on Day Ahead Flexible Ramping Product, CAISO should also make an effort to align the eligibility requirements. A resource may qualify under the RA rules to provide system RA, but not qualify under DAME to provide the Day-Ahead Flexible Ramping Product. Such a resource would not be able to satisfy the proposed requirement to bid in the day-ahead market.

Please provide your organization's position on the Day-Ahead Flexible Ramping Product as described in section 4 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

NCPA appreciates CAISO's recognition that load following metered sub-systems operate differently from other loads and that calculating billing determinants for an LF-MSS must account for its unique operational characteristics.

3. Re-Optimization of Ancillary Services

Please provide your organization's feedback on the re-optimization of ancillary services as described in section 5 of the proposal. Please explain your rationale and include examples if applicable.

NCPA has no comment at this time.

Please provide your organization's position on the re-optimization of ancillary services as described in section 5 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

4. Energy Imbalance Market Governing Body Classification

Please provide your organization's feedback on the EIM Governing Body classification as described in section 6 of the proposal. Please explain your rationale and include examples if applicable.

NCPA has no comment at this time.

Please provide your organization's position on the EIM Governing Body classification as described in section 6 of the proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

APPENDIX C: DRAFT TECHNICAL DESCRIPTION

5. Assumptions and Mathematical Formulations

Please provide your organization's feedback on the assumptions and mathematical formulations included in Appendix C. Please explain your rationale and include examples if applicable.

NCPA has no comment at this time.

Please provide your organization's position on the assumptions and mathematical formulations included in Appendix C. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

NCPA has no comment at this time.

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.