

Stakeholder Comments Template

Extended Day-Ahead Market Issue Paper

This template has been created for submission of stakeholder comments on the **Extended Day-Ahead Market (EDAM) issue paper** that was posted on October 10, 2019. Information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ExtendedDay-AheadMarket.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com by close of business on November 22, 2019.

Submitted by	Organization	Date Submitted
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The Balancing Authority of Northern California (“BANC”) is pleased to provide these Comments on Extending the Day Ahead Market to EIM Entities (“EDAM”) Issue Paper (“Issue Paper”), posted by the CAISO on October 10, 2019.

BANC looks forward to a robust stakeholder process to consider the myriad of complex issues implicated by EDAM. BANC is signatory to, and is supportive of, the Joint Comments of the EIM Entities. BANC emphasizes the following points:

- **Benefits Must be Broad and Equitably Shared.** If successful, the EDAM has the potential to transform the wholesale electricity market in the West, to facilitate the increased use of renewable resources, and to provide significant benefits to customers. Those benefits must be widespread and not limited to a particular region or set of entities. These objectives will only be achieved with extraordinary cooperation between the CAISO, stakeholders, and regulators. This is the foundational premise that guides BANC’s participation in this process.
- **A Full “Day Two” RTO Market is Not a Necessary First Step in Regional Collaboration.** BANC agrees that that in order to meet western state policy objectives for aggressive renewable development and associated greenhouse gas emission reductions in an economical manner, some form of a broader wholesale market is likely needed. The EDAM provides a possible solution in a scalable manner, with a relatively small investment. BANC is not persuaded that only a full

“Day-Two” RTO market will accomplish this purpose. EIM already provides a significant example of an industry-driven and consensus-based approach to market evolution. Consideration of EDAM should be the next step toward greater regional collaboration.

- **BANC is Looking to the Stakeholder Process to Develop and Refine Specific Positions.** As stated in the EIM Entity Comments, the EIM Entities represent a diverse group of market participants. While BANC supports the discussions set forth in the joint comments, BANC has not formulated its own specific viewpoints on certain market design issues or the detailed mechanics of the market that will be critical. BANC is hopeful that collaborative dialogue in the stakeholder process will help shape and refine positions.
- **The Proposed Stakeholder Process Schedule is Too Aggressive.** BANC specifically endorses the Revised Stakeholder Process schedule proposed by the EIM Entities. It is essential that the Stakeholder Process be paced in a realistic manner and provide an opportunity for thoughtful consideration of issues and collaboration among participants.

BANC is anxious to engage in the process to consider a beneficial expansion of regional markets.