

# Day-Ahead Market Enhancements Phase 1: Fifteen-Minute Granularity

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) Day-Ahead Market Enhancements (DAME) Phase 1: Fifteen-Minute Granularity second revised straw proposal<sup>1</sup>.

## **SCE does not support a delayed implementation**

The CAISO proposes a Fall 2020 implementation. First, SCE does not see any reason why the market has to wait to realize the benefits of fifteen minute DAM. Second, in addition to a delay in benefits, the CAISO is not leaving any time for dedicated adjustments that the implementation may require. The less time the CAISO leaves for an implementation to mature, the more likely there will be compounded problems from having Phase 1 and Phase 2 too close together.

## **SCE is encouraged by the direction of the CAISO proposal**

SCE believes that substantial details need to be worked out to ensure that this policy proposal accomplishes the CAISO's operational goals. SCE recommends that any information that can be publicly shared be brought to stakeholders' attention as the CAISO analyzes the data relevant to existing processes in regards to effective operationalization of this proposal.

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<sup>1</sup> <http://www.caiso.com/Documents/SecondRevisedStrawProposal-Day-AheadMarketEnhancementsPhase1-Fifteen-MinuteGranularity.pdf>