



Stakeholder Comments Template

Day-Ahead Market Enhancements Phase 1 Initiative

This template has been created for submission of stakeholder comments on the straw proposal that was published on February 7, 2020. The proposal, February 10, 2020 Stakeholder meeting presentation, March 5, 2020 Stakeholder call presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/StakeholderProcesses/Day-ahead-market-enhancements>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on March 26, 2019.

Submitted by	Organization	Date Submitted
<i>Grant McDaniel Greg Contreras Colin Orloff</i>	<i>Wellhead</i>	<i>3/26/20</i>

Please provide your organization’s overall position on the DAME straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

Please provide written comments on each of the straw proposal topics listed below:

1. New day-ahead market products, including reliability energy, reliability capacity, and imbalance reserves.

Wellhead continues to strongly support all aspects of the day-ahead market enhancements as proposed.

2. Settlement and cost allocations.

Wellhead supports CAISO’s proposal though additional detailed example will continue to be helpful as we work through this process.

3. Bidding rules and offer obligations.

Wellhead supports the proposed bidding rules and must offer obligations but notes that resources cannot simultaneously self-schedule 100% of their economic energy and still satisfy the economic bid requirement for reliability capacity.

4. Scheduling rules for variable energy resources.

Wellhead supports CAISO's proposal.

5. Deliverability approach for reliability capacity and imbalance reserves.

Wellhead strongly supports the proposal for nodal deliverability of reliability capacity and imbalance reserves.

6. Approach for congestion revenue rights.

Wellhead has no comments on the proposed CRRs at this time.

7. Approach for local market power mitigation.

Given that imbalance reserves and reliability capacity must be deliverable, at the nodal level, Wellhead supports CAISO's proposal to extend the local power market mitigation to these products.

8. Regression approach to determine the imbalance reserve requirement.

Wellhead supports the regression approach to determine the IR requirement.

9. Additional comments: