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
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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)

    CDWR supports the proposed 15-minute scheduling granularity with caveats. CDWR would like the following clarifications made in the next proposal:

    - CAISO notes in their 2/28 proposal that "Fifteen-minute bidding will be allowed for all resources participating in the day-ahead market: bid-in load, generation,

virtual supply and virtual demand". CDWR asks CAISO to clarify that "fifteen-minute bidding" includes self-schedules and/or economically bids. To meet its water delivery schedules, CDWR needs to continue to be allowed to self-schedule in the day-ahead market.

- CAISO notes in their 2/28 proposal how a scheduling coordinator's load meter data will be submitted, based on having a 15-minute, hourly, or "mixed" meter granularity. CDWR asks CAISO to also note how 5-minute metered load data from participating loads will be submitted.

- CAISO also notes that scheduling coordinators will specify in the Master File if they elect to use the "shaping" methodology for hourly meters. CDWR asks CAISO to clarify that selecting the shaping methodology will apply to specific resources, not a scheduling coordinator.

- CAISO notes in their 3/7 presentation that "If meters are mixed, hourly submission will be shaped by the CAISO for settlement purposes". CDWR asks CAISO to incorporate this statement in the next proposal, and to clarify that settlement for existing 5-minute and 15-minute metered loads will not be affected.

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.

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)

Currently, CDWR has no comments on this topic.

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)

Currently, CDWR has no comments on this topic.

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.