

**Comments on
CAISO's April 11, 2018
Day Ahead Market Enhancements Revised Straw Proposal**

May 2, 2018

CDWR requests that CAISO allow pumping loads (both participating load and non-participating load) and hydroelectric generators to submit 15-minute self-schedules in the day-ahead market. This will allow CDWR to more accurately communicate its load and generation profile to CAISO which will allow the CAISO to more accurately determine its ramping needs.

The proposed approach to move to fifteen-minute scheduling granularity in the day-ahead market is to maintain hourly bid submission in the day-ahead market while allowing different 15-minute awards within the hour for economically bid in resources. Non-participating loads and VERs that provide a 15-minute forecast in the day-ahead market will be able to use their forecast to also shape their respective hourly bids, even if the bid is submitted as a self-schedule.

CDWR's primary function is water management and its resources must release and pump water within coordinated time frames in order to maintain operational integrity of the water system and to meet regulatory requirements. One important tool that CDWR utilizes, where appropriate, is the use of self-schedules. CDWR believes it can continue to meet its primary function while providing CAISO 15-minute granularity in the day-ahead market. However, based on the proposed day-ahead market enhancements, CDWR's self-scheduled participating loads and generators will continue to be awarded in hourly blocks.