California Independent System Operator Corporation

April 3, 2026

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

INFORMATIONAL FILING-NO NOTICE REQUIRED

Re: California Independent System Operator Corporation
Informational Readiness Certification for Black Hills Service Company, LLC Participation in the WEIM
Docket No. ER15-861-000

Dear Secretary Reese:

The California Independent System Operator Corporation (CAISO) submits this informational filing in compliance with section 29.2(b)(6) of the CAISO tariff.[1] The CAISO, in consultation with Black Hills Power, Inc (Black Hills), has determined that, following market simulation and an adequate period of parallel operations, the CAISO and Black Hills have met all readiness criteria specified in section 29.2(b)(7).

In support of this determination the CAISO hereby submits the sworn CAISO affidavit of Khaled Abdul-Rahman, Vice President, Chief Information and Technology Officer, and the sworn Black Hills affidavit of Nick Gardner, Vice President. This filing certifies the readiness of CAISO and Black Hills to proceed with Black Hills' participation in the Western Energy Imbalance Market (WEIM) on May 6, 2026, consistent with the requirement to do so at least 30 days prior.

[1] The Commission has determined that readiness certifications are considered informational filings and will not be noticed for comment. *See Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,205 at P 86 and n.173 (2015); *see also Cal. Indep. Sys. Operator Corp.*, 155 FERC ¶ 61,283 at P 8 (2016).

I. Background

The WEIM provides other balancing authority areas the opportunity to participate in the real-time market for imbalance energy that CAISO operates in its own balancing authority area. PacifiCorp's balancing authorities were the first two balancing authorities to join the WEIM beyond the CAISO balancing authority area. The CAISO's WEIM tariff provisions went into effect on October 24, 2014, in time for the first trading day of November 1, 2014.[2] In a March 16, 2015 order,[3] the Commission concluded that certain readiness safeguards are necessary prior to activating a prospective WEIM entity in production.[4] Accordingly, the Commission directed the CAISO to include provisions in its tariff to ensure the readiness of any new WEIM entity. The Commission further required that the certification of market readiness include a sworn affidavit from an officer of the CAISO and an officer of the prospective WEIM entity attesting that both have prepared and made ready the systems and processes for the new WEIM entity to commence financially binding participation in the WEIM.[5] Following two compliance filings, the Commission accepted the CAISO's proposed readiness criteria.[6] These criteria appear in section 29.2(b)(7) of the CAISO Tariff.

II. Readiness Reporting, Determination, and Attestations

The CAISO and Black Hills ran market simulation scenarios from December 9, 2025, through January 31, 2026. Parallel (*i.e.*, financially nonbinding) operations, which began on February 18, 2026, will run through at least April 6, 2026, and, in any event, will continue to be supported and available to Black Hills until May 6, 2026. During market simulation and parallel operations the CAISO and Black Hills have engaged in daily discussions to track progress and confirm the status of each readiness criterion, and the CAISO has regularly reported on readiness status in market forum discussions and publicly posted a

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2 *See Cal. Indep. Sys. Operator Corp.*, 147 FERC ¶ 61,231 (2014) (June 19 Order) (conditionally accepting tariff revisions to implement Energy Imbalance Market); *Cal. Indep. Sys. Operator Corp.*, 149 FERC ¶ 61,058 (2014) (order denying requests for rehearing, granting in part and denying in part requests for clarification, and conditionally accepting tariff revisions on compliance with regard to order listed above); Commission Letter Order, 149 FERC ¶ 61,005 (Oct. 2, 2014) (order granting CAISO request to extend effective date of Energy Imbalance Market tariff revisions from September 23, 2014, to October 24, 2014, for trading day November 1, 2014).

3 *Cal. Indep. Sys. Operator Corp.,* 150 FERC ¶ 61,191 (2015) (March 16 Order).

4 March 16 Order at P 30.

5 *Id.* n.85.

6 *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,205 (2015).

table or "dashboard," showing progress towards meeting the readiness criteria.[7] The process of updating the readiness dashboard through this joint effort involved representatives from both organizations, including the senior representatives who have attested that the parties' processes and systems are ready for Black Hills's participation in the WEIM.

The market simulation confirmed system functionality and connectivity by identifying issues and software variances in advance of implementation that have since been resolved. In addition, market simulation permitted CAISO and Black Hills to validate performance of the systems and processes under a variety of structured scenarios. The market simulation demonstrated that CAISO and Black Hills were ready to enter parallel operations. Having achieved the benefits from market simulation, CAISO and Black Hills transitioned to parallel operations on February 18, 2026.

The parallel operations phase is designed to test performance of the systems and processes in a financially non-binding environment using historical data and information from production systems to the maximum extent possible. CAISO and Black Hills have engaged in parallel operations to examine capabilities at different times and conditions (morning ramp, evening ramp, low load and peak load). Doing so has permitted Black Hills to understand the interaction between resource plans, base schedules, outage management, manual dispatch, and the CAISO full network model. This period has also allowed CAISO and Black Hills to identify and resolve software issues. The dashboards dated December 31, 2025, January 30, 2026, March 6, 2026, and March 20, 2026, showed progress as additional readiness criteria were met. The final dashboard, dated April 1, 2026, is included as Attachment A. These dashboards set forth each of the readiness criteria in the tariff, the metrics by which the CAISO measures satisfaction of the criteria, and the actions or status that demonstrate Black Hills's compliance with criteria. The final dashboard shows that all readiness criteria have been satisfied or will be satisfied by April 6, 2026.

Section 29(b)(6) requires that a senior officer of the CAISO and a prospective WEIM entity attest (1) that the processes and systems of the prospective WEIM Entity have satisfied or will have satisfied the readiness criteria set forth in section 29.2(b)(7) as of the Implementation Date; (2) to any known issues requiring resolution prior to the Implementation Date in accordance with section 29.2(b)(8); (3) to any exceptions from the established thresholds specified in the Business Practice Manuals, and that despite such exceptions the

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[7] More information on the status of these reports consistent with CAISO tariff section 29.2(b)(8) is available on the CAISO website under the Spring 2026 release, WEIM onboarding entities: https://www.caiso.com/systems-applications/release-planning.

criteria were met or will be met as specified in 29.2(b)(7); and (4) that the Implementation Date is conditional on the resolution of the known issues identified in the certificates and any unforeseen issues that undermine the satisfaction of the readiness criteria. Attachments B and C, respectively, contain the sworn CAISO affidavit of Khaled Abdul-Rahman, Vice President, Chief Information and Technology Officer and the sworn Black Hills affidavit of Nick Gardner, Vice President in satisfaction of this requirement.

The affidavits are based upon the engagement by these senior representatives in assessing the readiness criteria as reported in the dashboard, including supporting documentation. The CAISO believes that the market simulation and parallel operations to date demonstrate that Black Hills is prepared to enter financially binding production WEIM operations on May 6, 2026. As discussed in the Market Quality Report included as Attachment D, any issues identified in the parallel operations have been resolved or will be resolved. Neither CAISO nor Black Hills has identified any exception to any of the readiness criteria.

III. Market Quality Report on Parallel Operations

Parallel operations allowed CAISO and Black Hills to identify and resolve numerous input, process, and software issues prior to the commencement of financially binding operations.[8] The CAISO and Black Hills worked diligently during parallel operations to identify the cause of the infeasibilities that arose. The attached Market Quality Report demonstrates that the majority of the power balance infeasibilities identified during the period of parallel operations associated with the readiness determination were caused by input data issues, some of which are unique to the parallel operations environment, certification of Black Hills as a new balancing authority and software issues, all of which have been or will be resolved by the implementation date.

The CAISO validated both prices and schedules based on the data input to the market systems throughout the first 20 days of parallel operations. This validation demonstrates that the market solution produced is as expected and consistent with the market rules as designed based on the input data. The analysis conducted for the report accounts for the fact that input data may be influenced by limitations inherent in the parallel operations environment and these limitations may affect the quality of the solution. When factors affecting the input data are controlled for, the numerical quality of the market solution is good

[8] The market quality report on parallel operations dated March 30, 2026, explains how each of these issues impacted the market results and how they were resolved by the CAISO and Black Hills.

and indicates that the systems and processes of Black Hills are ready to operate in production.

IV. Black Hills OATT Amendment

On December 12, 2025, Black Hills submitted revisions to its Open Access Transmission Tariff (OATT) to establish a new balancing authority area and to implement participation in the WEIM according to the CAISO tariff. On March 23, 2026, the Commission accepted Black Hills' proposed OATT revisions for filing, suspended them for a nominal period, to become effective April 1, 2026, as requested, subject to refund, and established hearing and settlement judge procedures.[9] This order does not concern the operational readiness of Black Hills to participate in the WEIM. Accordingly, CAISO submits this filing in support of Black Hills' WEIM participation on May 6, 2026, as provided in their revised OATT.

V. Attachments

Attachment A	Readiness Dashboard Report
Attachment B	Affidavit of Khaled Abdul-Rahman
Attachment C	Affidavit of Nick Gardner
Attachment D	Parallel Operations Market Quality Report

[9] *Black Hills*, 194 FERC ¶ 61,229 (2026).

V. Conclusion

The CAISO respectfully requests that the Commission accept this certification as consistent with section 29.2(b)(6) of the CAISO tariff.

Respectfully submitted,

By: *__/s/ John C. Anders__*
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA this 3rd day of April, 2026.

/s/ Jacqueline Meredith

Jacqueline Meredith
California ISO
250 Outcropping Way
Folsom, CA 95630

Attachment A – Readiness Dashboard Report

Informational Readiness Certification for Black Hills

California Independent System Operator Corporation

April 3, 2026

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
1	Prospective WEIM Entity Full Network Model Integration	Generation, Interchange and Load comparison	Load, WEIM Internal Intertie and WEIM External Interties, and Generating Unit definition in the Full Network Model is consistent with the Load, WEIM Internal Intertie and WEIM External Interties, and Generating Unit definition in the exported prospective WEIM Entity network model file that it delivered to the CAISO.	Data matches within 10%, measured in MW capacity to start parallel operation, and within 5% before full activation. Any Discrepancies are accounted for in terms of imbalance adjustment	CAISO	Complete	CAISO team provided evidence which was validated and approved for both Market SIM and Parallel Ops	Tariff section 29.2(b)(7)(A)(i)
2	Prospective WEIM Entity Full Network Model Integration	Comparison of SCADA measurement	SCADA measurements used in prospective WEIM Entity EMS model match the measurements observed by the CAISO through the CAISO EMS model	Critical and used SCADA measurements match 90% to start parallel operation and 95% before full activation, measured in MW, outside of any exception in EMS model	CAISO	Complete	CAISO team provided evidence which was validated and approved for both Market SIM and Parallel Ops	Tariff section 29.2(b)(7)(A)(ii)
3	Prospective WEIM Entity Full Network Model Integration	State Estimator solution	CAISO state estimator solution is equivalent or superior to the prospective WEIM Entity state estimator solution for its Balancing Authority Area.	State Estimator solutions converge >90% of the time in two days before parallel operation and three days before full activation. Solution differences within 10% before parallel operation and 5% before full activation measured in MW or justified due to different external BAA modeling	CAISO	Complete	CAISO team provided evidence which was validated and approved for both Market SIM and Parallel Ops	Tariff section 29.2(b)(7)(A)(iii)
4	Prospective WEIM Entity Full Network Model Integration	Non-Conforming Load, Behind-the-Meter Generation, Pseudo Ties, and Dynamic Schedules	Physical representation of the prospective WEIM Entity's network matches the Base Market Model that accounts for non-conforming load, behind-the-meter generation, pseudo-ties, and dynamic schedules, and third party transmission service provider and path operator information that supports WEIM Transfers and Real-Time Dispatch in the Energy Imbalance Market, as applicable	Prospective WEIM Entity major non-conforming loads > 5% of prospective WEIM Entity total actual load in MW are modeled separately from conforming load in market model	CAISO	Complete	CAISO team provided evidence which was validated and approved for both Market SIM and Parallel Ops	Tariff section 29.2(b)(7)(A)(iv)
5	Agreements	Execution of Necessary Agreements	The prospective WEIM Entity has executed all necessary agreements.	The prospective WEIM Entity will execute all agreements, as outlined in Section 5 of the WEIM BPM within the required timelines outlined in Section 5.	JOINT	Complete	Black Hills provided copies of all executed agreements. CAISO affirmed that all planned agreement tasks are complete.	Tariff section 29.2(b)(7)(K)(i)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
6	Operations Training	Completion of mandatory training courses	Prospective WEIM Entity operators who will have responsibility for WEIM operations, transactions and settlements, will complete CAISO training modules.	Prospective WEIM Entity operators will Complete training and close-of-training assessment in the appropriate timeframes as outlined in "100 series"– an introduction to Energy Imbalance Market training "200 series"– the specific hourly and daily tasks and duties for normal operation training module; and "300 series"– the assessment of market results and response to contingencies and abnormal situations training module.	Black Hills	Complete	BHE provided transcripts of training and email confirmation of completion, CAISO provided evidence which was validated and approved	Tariff section 29.2(b)(7)(B)
7	Forecasting Capability	Load forecast capability	Definition of WEIM demand forecast boundaries based on the conforming and non-conforming load characteristics, as applicable. • Accuracy of the CAISO forecast of WEIM demand based on historical actual load data for the defined WEIM demand forecast boundaries. • Identification of weather station(s) locations used in forecasting, if applicable.	All Plant Information (PI) tags and historical data for defined load area(s), and non-conforming load, if applicable, compared with load forecasts provided from CAISO (if CAISO load forecast used).	CAISO	Complete	STF team provided screen shot evidence and verified this item and all load tasks are complete	Tariff sections 29.2(b)(7)(C)(i)-(iii)
8a	Forecasting Capability	Variable Energy Resource (VER) forecast capability	Identification of the source of VER forecasts. (If a participating wind or solar unit requires a CAISO forecast, then BPM and Tariff requirements apply.)	Forecasting entity must demonstrate delivery of Unit MW forecast at 5 min intervals for at least three hours ahead. Forecasting entity must also provide base schedule by T-75, T-55 and T-40. WEIM Entity provides to CAISO real-time MW production PI tags.	CAISO	Complete	STF team provided screen shot evidence and verified this item and all load tasks are complete	Tariff section 29.2(b)(7)(C)(iv)
8b	Forecasting Capability	Hybrid Resources forecast capability	Identification of all Hybrid Resources, source of Hybrid Resource forecasts, and confirmation applicable tariff and BPM requirements are met.	Forecasting entity must demonstrate delivery of Unit MW forecast at 5 min intervals for at least three hours ahead. Forecasting entity must also provide base schedule by T-75, T-55 and T-40. For participating hybrid resources WEIM entity submits documents required by Appendix Q: Site information sheet, topo map, shapefile. WEIM entity provides real-time MW production PI tags for all Resources, and metrological measurements for participating hybrid resources required by Appendix Q.	CAISO	Complete	STF team provided screen shot evidence and verified this item and all load tasks are complete	Tariff section 29.2(b)(7)(C)(v)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
9	Forecasting Capability	Flexible capacity requirements	CAISO has established flexible capacity requirements for the prospective WEIM Entity Balancing Authority Area and the combined WEIM Area including the prospective WEIM Entity	The CAISO has received and stored all historical data from the prospective WEIM Entity necessary and sufficient for the CAISO to perform the flexible ramp requirement.	CAISO	Complete	STF team provided screen shot evidence and verified this item and all load tasks are complete	Tariff section 29.2(b)(7)(K)(iv)
10	Balanced Schedules	Base schedule balancing capability	The prospective WEIM Entity Scheduling Coordinator demonstrates its ability to balance WEIM demand and WEIM supply for the prospective WEIM Entity's Balancing Authority Area	90% or greater of base schedules balance tests during monitored hours are within 10% average imbalance of load forecast over one day period before parallel operation, and 5% average over five full days before full activation. The CAISO will provide examples of MW thresholds for each prospective WEIM Entity to indicate a reasonable threshold as it applies to a given WEIM Entity and indicate the potential implications of a swing from 5% over to 5% under forecast in one hour to the next.	Black Hills	Complete	Market SIM: CAISO reviewed the screenshot evidence from BHE and confirmed they met the readiness criteria, email attached. Parallel Ops: CAISO provided reports showing 90% or greater of base schedules balance tests during monitored hours are within 5% average over five full days before full activation.	Tariff section 29.2(b)(7)(D)(i)
11	Balanced Schedules	Flexible ramping sufficiency test capability	The prospective WEIM Entity \ Scheduling Coordinator demonstrates its ability to pass the flexible ramping sufficiency test.	Passes 90% of the time or greater over monitored hours of one day before parallel operation and five non-consecutive days before full activation.	Black Hills	Complete	Market SIM: CAISO reviewed the screenshot evidence from BHE and confirmed they met the readiness criteria, email attached. Parallel Ops: CAISO provided reports showing 90% or greater of Flexible Ramping tests during monitored hours of five non-consecutive days before full activation.	Tariff section 29.2(b)(7)(D)(iii)
12	Balanced Schedules	Capacity test capability	The prospective WEIM Entity Scheduling Coordinator demonstrates its ability to pass capacity test	Passes 90% of the time or greater over monitored hours of one day before parallel operation and five non-consecutive days before full activation. The CAISO will explain the implications of any potential issues with the reliability of a WEIM Entity to meet its capacity requirements.	CAISO	Complete	Market SIM: CAISO reviewed the screenshot evidence from BHE and confirmed they met the readiness criteria, email attached. Parallel Ops: BHE sent evidence and CAISO provided reports showing 90% or greater of Capacity tests during monitored hours of five non-consecutive days before full activation.	Tariff section 29.2(b)(7)(D)(ii)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
13	Operating Procedures	CAISO operating procedures (relevant to WEIM operations)	The prospective WEIM Entity signs CAISO non-disclosure agreement and receives appropriate CAISO "public" and "restricted" operating procedures	Operating procedures NDA signed by the prospective WEIM Entity. The prospective WEIM Entity receives CAISO operating procedures four months prior to the parallel operations date.	JOINT	Complete	Black Hills confirmed that they have been given access to all publicly available Operations documents available on CAISO website	Tariff section 29.2(b)(7)(K)(i)
14	Operating Procedures	Prospective WEIM Entity operating procedures	The prospective WEIM Entity operating procedures are defined, updated, and tested for the WEIM Entity Scheduling Coordinator	The prospective WEIM Entity operating procedures are updated tested and implemented prior to parallel operations date.	Black Hills	Complete	BHE confirmed readiness via email and sent copies of Operational Procedure documents for both EESC and PRSC.	Tariff section 29.2(b)(7)(K)(ii)
15	System Readiness & Integration	Functional Testing	The prospective WEIM Entity and the CAISO will test the functional and system elements in accordance with functional and system testing documentation posted on the CAISO website	All tasks identified in the functional and system testing documentation are complete and will not have any issues deemed significant. Any exceptions will be explained or have an interim solution that is functionally equivalent.	Black Hills	Complete	CAISO reviewed the evidence provided; based on the attached test results, Black Hills has met readiness criteria. Documents are stored in the CAISO project SharePoint.	Tariff section 29.2(b)(7)(E)(i)
16	System Readiness & Integration	System Integration	The prospective WEIM Entity and CAISO will test system integration testing in accordance with the system integration testing documentation posted on the CAISO website	All tasks identified in the system integration testing documentation are complete and will not have any issues deemed significant. Any exceptions will be explained or have an interim solution that is functionally equivalent.	Black Hills	Complete	CAISO reviewed the evidence provided; based on the attached test results, Black Hills has met readiness criteria. Documents are stored in the CAISO project SharePoint.	Tariff section 29.2(b)(7)(E)(ii)
17	System Readiness & Integration	The prospective WEIM Entity system access complete	All prospective WEIM Entity employees who require system access to perform WEIM-related job functions identified and have necessary certificates.	All prospective WEIM Employees performing job functions for WEIM market are identified. All CAISO issued certificates are requested within the appropriate timeframes. All identified employees provided the necessary WEIM system access certificates.	Black Hills	Complete	BHE verified by email that all access for Parallel Operations is in place and there is a plan in place to ensure all access for Production. CAISO confirmed all access is in place and there is a plan for ensuring access for production.	Tariff section 29.2(b)(7)(E)(iii)
18	System Readiness & Integration	ISO - prospective WEIM Entity interfaces	Data interfaces between prospective WEIM Entity's systems and CAISO systems are tested	ISO and prospective WEIM Entity identify significant data interface issues. WEIM Entity and CAISO executives to approve exceptions.	JOINT	Complete	CAISO reviewed the evidence provided; based on the attached test results, Black Hills has met readiness criteria. Documents are stored in the CAISO project SharePoint.	Tariff section 29.2(b)(7)(E)(i)
19	Market Simulation	Day in the life simulation	The prospective WEIM Entity operators are able to meet the market timelines	The prospective WEIM Entity grid operations staff complete end-to-end daily market workflow with no critical defects.	JOINT	Complete	CAISO reviewed the evidence provided; based on the attached test results, Black Hills has met readiness criteria. Documents are stored	Tariff section 29.2(b)(7)(I)(ii)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
							in the CAISO project SharePoint.	
20	Market Simulation	Structured scenarios simulation	The prospective WEIM Entity operators execute and pass all structured scenarios provided by CAISO	All significant issues resolved or have an interim solution that is functionally equivalent.	JOINT	Complete	All tests passed, settlements validated by the entity and CAISO. Results reviewed and approved by CAISO.	Tariff section 29.2(b)(7)(I)(iii)
21	Market Simulation	Unstructured scenarios simulation	The prospective WEIM Entity operators execute and pass all unstructured scenarios provided by prospective WEIM Entity	All significant issues resolved or have an interim solution that is functionally equivalent.	JOINT	Complete	Not Applicable, no Unstructured scenarios needed	Tariff section 29.2(b)(7)(I)(iv)
22	Market Simulation	Market results reports	Market results are appropriate based on inputs	The prospective WEIM Entity and CAISO executive project sponsors approve the market results reports during market simulation	Black Hills	Complete	Market Quality team provided an email confirming they validated this for BHE	Tariff section 29.2(b)(7)(I)(v)
23a	Market Simulation	Market quality review	Prices are validated based on input data	Market simulation prices and MWs schedules/dispatches are validated by CAISO market quality team for entry into parallel operations	CAISO	Complete	Market Quality team provided an email confirming they validated this for BHE	Tariff section 29.2(b)(7)(I)(vi)
23b	Parallel Operations	Market quality review	Prices are validated based on input data	Parallel operations prices and MWs schedules/dispatches are validated by the CAISO market quality team	CAISO	Complete	ISO Market Quality team provided the analysis report and had the entity review it.	Tariff section 29.2(b)(7)(I)(vi)
24	Market Simulation	The prospective WEIM Entity Identification	Validation of SCID's and Resource ID's	The CAISO has established and the prospective WEIM Entity has tested all necessary SCIDs and Resource IDs established for the prospective WEIM Entity's Balancing Authority Area	JOINT	Complete	Entity provided schedule 1 with confirmation email, CAISO confirmed all schedule 1 resources and provided the roles matrix.	Tariff section 29.2(b)(7)(I)(i)
25	Settlements	ISO Settlement Statements and Invoices published to the prospective WEIM Entity and WEIM Participating Resources	The CAISO Settlement statements and invoices match the operational data published to stakeholders or fed into settlement system and the resulting calculations correspond to the formulas defined in ISO's tariff and BPMs	Monthly settlement statement and invoice with corresponding daily statements produced during market simulation and parallel operations are verifiably accurate against available data.	JOINT	Complete	BHE confirmed they have receipt of initial and recalculation statements, CAISO Settlements verified accuracy of statements and invoices.	Tariff section 29.2(b)(7)(F)(i)
26	Settlements	The prospective WEIM Entity settlement statements and invoices reflect accurate allocations to the prospective WEIM Entity customers prior to	Verification that settlement statements and invoices accurately reflects system and market data	The prospective WEIM Entity settlement statements and invoices that allocate charges and credits to its customers accurately reflect system and market data during parallel operations.	JOINT	Complete	BHE confirmed accuracy of statements and invoices, CAISO Settlements verified accuracy of statements and invoices.	Tariff section 29.2(b)(7)(F)(ii)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
		financially binding operations.						
27	Monitoring	Data monitoring	Sufficient and adequate data is available to the CAISO and the Department of Market Monitoring	All required market monitoring data is available during testing and during post go-live for the key metrics (any exceptions will be addressed). CAISO will provide a market report that will provide publicly available information to all market participants.	CAISO	Complete	CAISO confirms that they are able to see the data in EDR Stage to complete our analysis. In Progress for DMM to validate	Tariff section 29.2(b)(7)(K)(v)
28	Parallel Operations Plan	Deployment plan	Parallel operations run consistently and in accordance with the timeframe set forth in the prospective WEIM Entity specific parallel operation plan	Parallel operations runs consistently within normal production CAISO Market disruption tolerances.	CAISO	Complete	CAISO VP confirms Parallel Operations ran consistently within normal tolerances	Tariff section 29.2(b)(7)(J)
29	Outage Management System	Transmission and generation outage submittal and retrieval	The prospective WEIM Entity will verify its ability to submit and retrieve outage information with the CAISO	The prospective WEIM Entity validate their ability to submit and retrieve transmission out-of-service outages, generation Pmax derates, generation Pmin rerates, and generation out-of-service outage tickets within the required timelines.	JOINT	Complete	ISO sent screen shots of outages and the entity verified with evidence that outages matched.	Tariff section 29.2(b)(7)(G)
30	Communications between the CAISO and the prospective WEIM Entity	Voice and/or electronic messaging	Implemented process and procedures used for voice and/or electronic messaging	The process and procedures are incorporated into the prospective WEIM Entities business processes before the start of market simulation.	Black Hills	Complete	CAISO RTMO was able to successfully execute communications, both by phone and by Everbridge message, with BHE's Real-Time WEIM Market Desk	Tariff section 29.2(b)(7)(H)(i)
31	Communications between the CAISO and the prospective WEIM Entity	Communication tools	Staff are trained on communication procedures and tools	The prospective WEIM Entity operations staff who will have responsibility for WEIM operations, transactions and settlements are trained on the relevant operating procedures and tools used for WEIM related communications before the start of parallel operations	Black Hills	Complete	CAISO RTMO was able to successfully execute communications, both by phone and by Everbridge message, with BHE's Real-Time WEIM Market Desk	Tariff section 29.2(b)(7)(H)(ii)
32	Communications between the CAISO and the prospective WEIM Entity	3rd party transmission service provider	The third party transmission service provider information that supports WEIM Transfers and Real-Time Dispatch included in the Full Network Model is available during parallel operations	The CAISO provides third party transmission service provider and path operator information to the prospective WEIM Entity through parallel operations	Black Hills	Complete	BHE provided email confirmation regarding 3rd party transmission, CAISO reviewed evidence provided and approved.	Tariff section 29.2(b)(7)(H)(iii)
33	WEIM Available Balancing Capacity	Identification of WEIM Available Balancing Capacity	Participating resources and non-participating resources for WEIM Available Balancing Capacity.	The prospective WEIM Entity has identified WEIM participating resources and non-participating resources that it intends to designate in the WEIM Resource Plan as WEIM Available Balancing Capacity	Black Hills	Complete	BHE submitted confirmation of ABC capacity, CAISO is reviewing for validation	Tariff section 29.2(b)(7)(K)(iii)

Attachment B – Affidavit of Khaled Abdul-Rahman

Informational Readiness Certification for Black Hills

California Independent System Operator Corporation

April 3, 2026

California ISO

Affidavit of Khaled Abdul-Rahman Certifying Readiness of Black Hills Service Company, LLC (Black Hills) Implementation in the Energy Imbalance Market

I, Khaled Abdul-Rahman, Vice President, Chief Information and Technology Officer for the California Independent System Operator Corporation (CAISO), hereby certify as follows:

1. As the Vice President, Chief Information and Technology Officer, I am responsible for the systems and processes that support and enable the Western Energy Imbalance Market (WEIM) and, as such, I have responsibility for the implementation of Black Hills into that market.

2. I have reviewed the readiness dashboard and find that it is accurate and complete. All readiness criteria set forth in the CAISO's tariff and business practice manual have been satisfied or are expected to be satisfied as of Black Hills' May 6, 2026 implementation date.

3. Based on the readiness dashboard and other materials and my own review of relevant information and direct involvement with the readiness efforts, including testing, market simulation, training and parallel operations, and barring unforeseen developments, the systems and processes of the CAISO and Black Hills will be ready to implement Black Hills' implementation in the WEIM on May 6, 2026.

4. I will ensure that CAISO maintains resource commitments necessary to sustain readiness through May 6, 2026 and address any unexpected conditions that may arise before May 6, 2026 that could undermine grid operation or market operation within the existing WEIM area. I will continue to monitor progress and resolve any unexpected conditions that may arise.

5. Actual implementation of Black Hills on May 6, 2026 is conditioned upon the lack of any unexpected and unresolved issues that could undermine grid operation or market operation within the existing WEIM area. I will update this certification in the event any unexpected issues are not resolved as of May 6, 2026.

I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief:

DocuSigned by:
Khaled Abdul-Rahman
018C598C28F6464...

Khaled Abdul-Rahman, Vice President, Chief Information and Technology Officer

March 31, 2026

Attachment C – Affidavit of Nick Gardner

Informational Readiness Certification for Black Hills

California Independent System Operator Corporation

April 3, 2026

Affidavit of Nick Gardner certifying readiness of the Black Hills Service Company, LLC (Black Hills) Implementation in the Western Energy Imbalance Market

I, Nick Gardner, Vice President of Black Hills, hereby certify as follows:

1. As the Vice President, I am ultimately responsible to the Black Hills for ensuring that all the systems and processes that support and enable the Black Hills Balancing Authority Area to participate in WEIM are established and ready for WEIM operations. As such, I have overall responsibility for the implementation of Black Hills's entry into that market.

2. I have reviewed the readiness dashboard and find that it is accurate and complete. All applicable readiness criteria set forth in the California Independent System Operator's ("CAISO") tariff and business practice manual for the WEIM have been satisfied or are expected to be satisfied as of Black Hills's May 6, 2026, implementation date.

3. Based on the readiness dashboard and other materials prepared for me or for those that report directly to me and my own review of relevant information and direct involvement with readiness efforts, including testing, market simulation, training and parallel operations, and barring unforeseen developments, the systems and processes of CAISO and Black Hills will be ready to implement Black Hills's participation in the WEIM on May 6, 2026.

4. I will ensure that Black Hills maintains resource commitments necessary to sustain readiness through May 6, 2026 and address any unexpected conditions that may arise before May 6, 2026 that could undermine grid operation or market operation within the existing WEIM area. I will continue to monitor progress and resolve any unexpected conditions that may arise.

5. Actual implementation of Black Hills's entry on May 6, 2026, is conditioned upon the lack of any unexpected and unresolved issues that could undermine grid operation or market operation within the existing WEIM area. I will update this certification in the event any unexpected issues are not resolved as of May 6, 2026.

I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Signed by:

DC291179FA86449...

Nick Gardner
Vice President

Attachment D – Parallel Operations Market Quality Report

Informational Readiness Certification for Black Hills

California Independent System Operator Corporation

April 3, 2026

Market Validation of Parallel Operations for Black Hills Balancing Authority (BHBA) WEIM Entity

March 30, 2026

Contents

Executive Summary

Parallel operations activities of the Western Energy Imbalance Market (WEIM) for Black Hills started on February 18, 2026. This effort provides an opportunity to assess the readiness of Black Hills Balancing Authority (BHBA), the prospective Energy Imbalance Market (WEIM) Entity, to participate in the WEIM. One of the readiness criteria requires the ISO to provide a market performance report for the period of parallel operations carried out for the integration of BHBA into the real-time energy imbalance market. This report fulfills that requirement and summarizes the main findings of market validation carried out by the ISO with an emphasis on the WEIM results for BHBA.

The ISO validated both prices and schedules as part of the overall market performance based on input data that fed to the market systems parallel operations from February 18 through March 20, 2026. This validation demonstrates that the market solution produced is as expected and is consistent with the market rules as designed, recognizing that the input data may be influenced by limitations inherent in the parallel operating environment and these limitations may affect the quality of the solution. When factors affecting the input data are controlled for, the quality of the market solutions are as expected and indicate that the systems and processes of BHBA can operate in production.

Background and Scope

The intent of parallel operations is to run the market to simulate as close as practically possible actual operating conditions of the system, and to provide BHBA with an opportunity to go over specific day-to-day processes and activities required for the operation of the WEIM. This set-up provides BHBA and the ISO with an opportunity to test their systems and procedures in advance of financially binding market operations.

Although closely resembling actual operations, parallel operations have some inherent limitations that need to be considered when evaluating market results, including the following:

i) The real-time market requires a set of data inputs to run. In actual real-time market operations, many of these inputs are dynamic, dependent on the participants' resources actual performance, and following instructions. For example, in an actual operating environment, telemetry received from resources gives the information to the ISO system of the operating status of the units, which are changing dynamically and interact with the market systems as the conditions change. During parallel operations, these iterative and interactive data processes are limited because the resources of the prospective WEIM entity are not yet required to follow their five-minute dispatch instruction. Similarly, if telemetry from actual production is used, there may be a potential for mismatches between what the actual system is running with versus what the market is projecting due to units potentially not following market instructions. Therefore, the information regarding the resource's performance feedback to the market systems may or may not be related to the dispatch instruction issues through the parallel operations environment.

ii) In actual operations, intertie resources require a closed loop for the market system to fully reflect the system and market conditions, and intertie schedules eventually need to be tagged to reflect the system data flows. For parallel operations, it is not possible to replicate fully the actual tagging process, which may pose an additional challenge based on the data that is fed into the market system.

iii) During parallel operations, the market participant is still defining its resources' data, including characteristics and bids, which consist of three-part bids used for generation resources that require careful consideration of start-up, minimum load and energy bid costs. During this period, the participant is also learning the impacts of the resources constraints on the actual operations of the market.

iv) During the period of parallel operations, the prospective WEIM entities bids and base schedules are merged with the bids and base schedules from the current production systems to simulate the actual production environment. The process of combining information from two systems needs some time to synchronize the data flow across various applications.

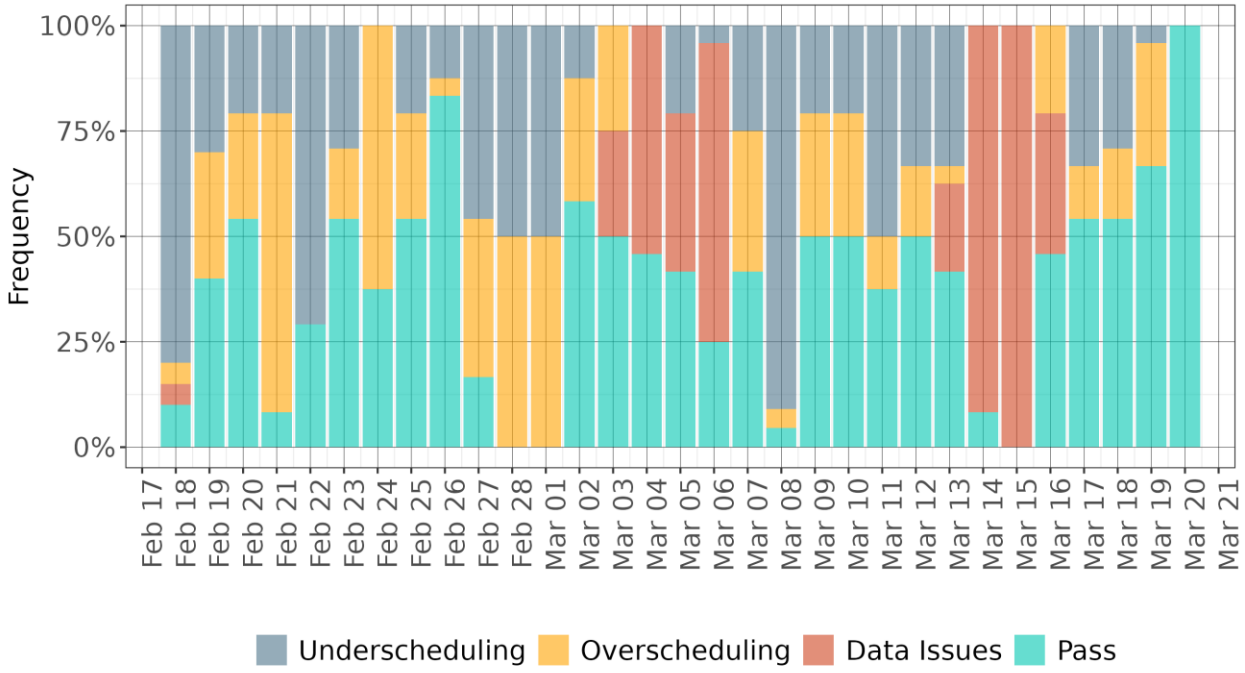
These factors, among others, influence the market results and the quality of the solution. Therefore, conclusions on the quality of the market results must consider the input data and the inherent set-up for parallel operations to avoid misleading conclusions about the actual functionality and robustness of the market. The Market Trends section provides metrics that capture BHBA's market performance during parallel operations; also, it includes various system issues that were identified during parallel operations and that affected market performance. The Market Validation items section provide a summary of issues identified during parallel operations.

Market Trends

Figure 1 shows the BHBA BAA's performance for the balancing test as required under section 29.34(k) of the ISO tariff for the period of February 18, 2026 until March 20, 2026. The balancing test provides a reference to how well balanced (energy supply defined by the hourly base schedules meets the demand defined by the forecast respectively) the WEIM entity BAA is going to be into the real-time energy imbalance market. Having a large percentage of positive imbalance means the real-time market will be the last resort to balance the area incrementally. The incremental balancing of supply will come from the bid-in capacity made available in the market in addition to the base schedule or WEIM transfers between the participating WEIM entities' BAAs.

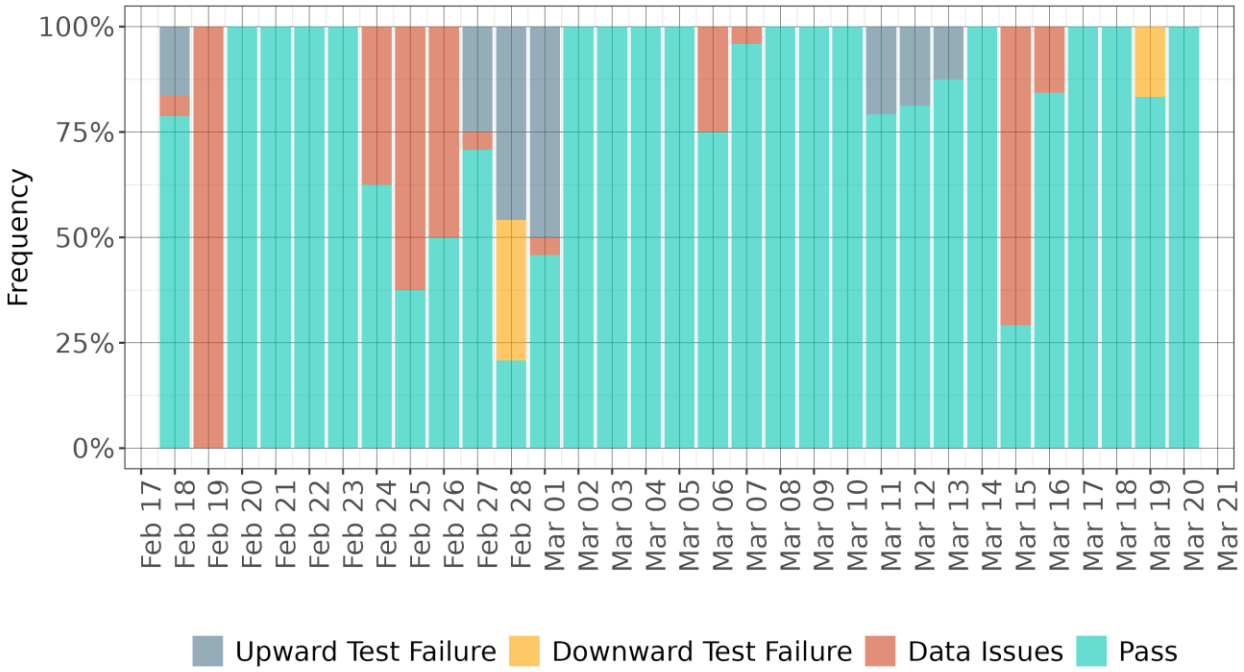
BHBA is in the process of getting balancing area certification and operation as a new BAA on 4/1/2026. Therefore, BHBA is not yet staffed to operate 24/7 before they commence BAA operation on 4/1/2026. During the WEIM parallel operations, BHBA was staffed 7am MT – 3pm MT weekdays only through March 15, and 6am MT – 6pm MT weekdays only since March 16. It should be noted that even though this report shows the graphs and statistics for all hours of the day for added transparency, the focus and decision for evaluating readiness is based on the staffed hours which comprise almost 50% of the 24 hours being tracked in the report. ISO-side data issues caused the financially binding Real-Time Base Schedule (RTBS) run, or RTBS 3, to incorrectly pick up RTBS 2 payloads on March 3 and 4. A separate ISO-side data issue involving the incorrect mapping of BAAs for a mirror resource led to test failures on February 18, March 5, and March 6. Furthermore, ISO-side data issues prevented BHBA from being able to submit base schedules through BSAP, resulting in numerous failures on March 15 and 16. Finally, BHBA failed the balancing test regularly outside staff-supported hours. Considering the staffed hours without data issues, BHBA had a 100% passing rate for the balancing test on 11 days which exceeds our target of demonstrating a 90% pass rate on 5 parallel operations days.

Figure 1: Daily frequency of power balancing test results



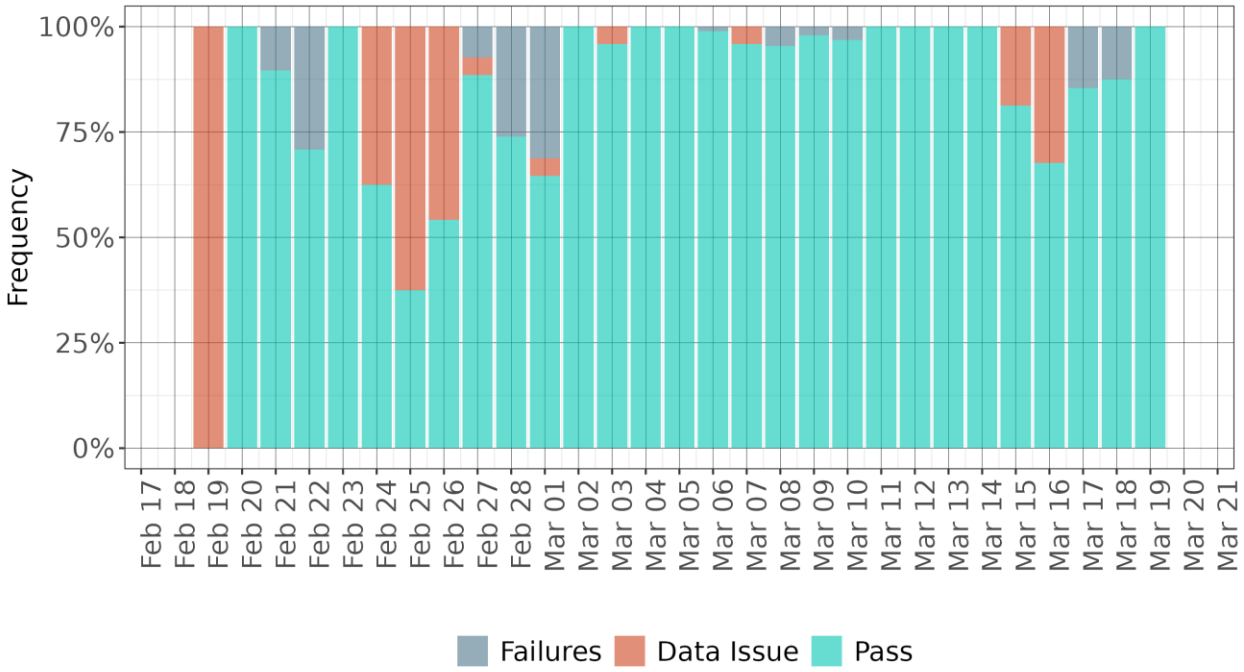
A second test carried out before running the real-time market is the bid-range capacity test. Figure 2 shows the BHBA BAA's performance for the bid-range capacity test for February 18 through March 20, 2026. BHBA passed the bid range capacity test in the upward direction in 93.1% of all intervals without data issues and 100% of staffed intervals without data issues. BHBA passed the bid range capacity test in the downward direction in 98.1% of all intervals without data issues and 100% of staffed intervals without data issues. About 40% of the failed intervals were due to a ISO-side data issue in which the market application could not process bids. BHBA had successfully submitted bids via the Scheduling Infrastructure and Business Rules (SIBR) system, but the bids were not transferred to the market application. Additionally, ISO-side data issues prevented BHBA from being able to submit base schedules through BSAP, resulting in numerous failures on March 15 and 16.

Figure 2: Daily frequency of bid range capacity test results



A third test carried out before running the real-time market is the flexible ramp sufficiency test, as required by section 29.34 (m) of the ISO tariff. The flexible ramp sufficiency test evaluates whether the WEIM entity has sufficient flexible ramp capacity to meet both its upward and downward ramp requirements based on optimized resource schedules before the trading hour. From February 18 through March 20, 2026, BHBA passed the flexible ramp up test in 94.7% of all intervals without data issues and 99.7% of staffed intervals without data issues. BHBA passed the flexible ramp down test in 99.8% in all intervals without data issues and 100% of staffed intervals without data issues. More than half of the failed intervals were due to a ISO-side data issue in which the market application could not process bids. BHBA had successfully submitted bids via SIBR, but the bids were not transferred to the market application. Additionally, ISO-side data issues prevented BHBA from being able to submit base schedules through BSAP, resulting in numerous failures on March 15 and 16.

Figure 3: Daily frequency of flexible ramp test results



Figures 4 and 5 show the frequency of power balance constraint infeasibilities for under-generation conditions in both the Fifteen Minute Market (FMM) and real-time dispatch (RTD) markets, respectively. The power balance constraint infeasibilities are pegged to the corresponding penalty prices, of $1000/MWh (or $2000 for certain conditions under implementation of FERC order 831) for under-supply infeasibilities, and about -$150/MWh for over-supply infeasibilities. However, during parallel operations, the WEIM market for BHBA has been set-up to run under the conditions reflecting the price discovery mechanism that is in effect under the transitional period (the first six months in an actual production system). Under this functionality, when its power balance constraint is infeasible, the market will reflect the last economic signal instead of the penalty prices.

The six-month transitional period pricing is based on the FERC Order[1], which grants the prospective WEIM entity the time to re-adjust and fine-tune its systems, processes, and procedures to avoid conditions that trigger administrative penalty prices due to false under-supply or over-supply conditions. The transition period pricing also shields the prospective WEIM entity from getting administrative penalty prices during the first six months. This period allows the entity to gain production experience in dealing with timely response to inform the market about operators' manual actions that are taken or decided outside the market to maintain the WEIM entity BAA reliability or balancing needs such as deployment of operating reserve in response to forced outages.

[1] *Calif. Ind. System Op.*, 153 FERC ¶ 61,104 (2015).

Figure 4: Daily frequency of supply infeasibilities in the fifteen-minute market

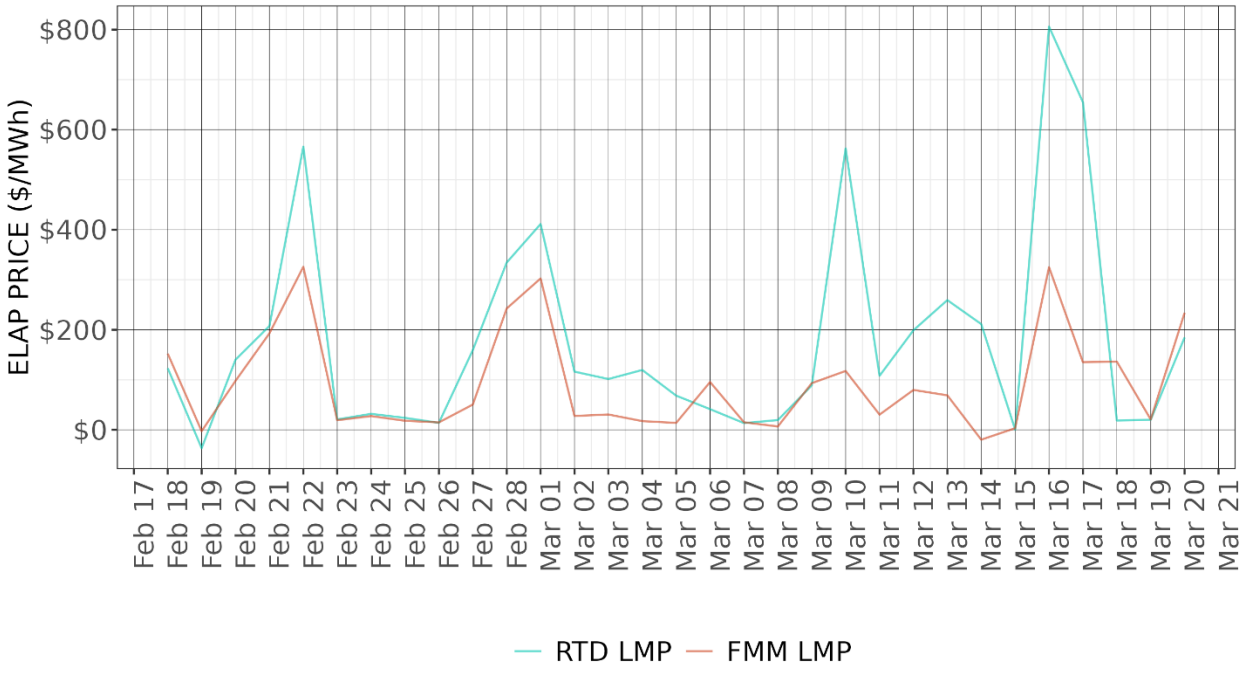
From February 18 to March 20, of all FMM intervals including periods where there was no staff support, BHBA had 192 intervals with under-supply power balance infeasibilities and 102 intervals with over-supply power balance infeasibilities. 13 of the intervals would be corrected because of a defect which led to BHBA incorrectly exporting on net during under-supply infeasibilities while 210 intervals were impacted by a ISO-side data issue in which the market application could not process bids. BHBA had successfully submitted bids via SIBR, but the bids were not transferred to the market application. For trade dates such as February 28 and March 1, BHBA was not staffed and failed numerous RSE tests which resulted in reduced EIM transfers and tight supply conditions.

For the five-minute market, BHBA had 821 intervals with under-supply power balance infeasibilities and 307 intervals with over-supply power balance infeasibilities. 19 of the intervals would be corrected because of a defect which led to BHBA incorrectly exporting on net during under-supply infeasibilities. 645 intervals were impacted by a ISO-side data issue in which the market application could not process bids. BHBA had successfully submitted bids via SIBR, but the bids were not transferred to the market application. In addition, 27 intervals were impacted by a ISO-side data issue involving payloads for EIM transfer limits that caused sudden drops in the limits. For trade dates such as February 28 and March 1, BHBA was not staffed and failed numerous RSE tests which resulted in reduced EIM transfers and tight supply conditions. Furthermore, for February 24, February 25th, and March 1st through March 22nd, the telemetry simulator was on in the Stage environment while persistence forecasting was active for all WEIM BAAs. This combination resulted in lower VER generation in RTD than in FMM and contributed to RTD infeasibilities.

Figure 5: Daily frequency of supply infeasibilities in the five-minute market

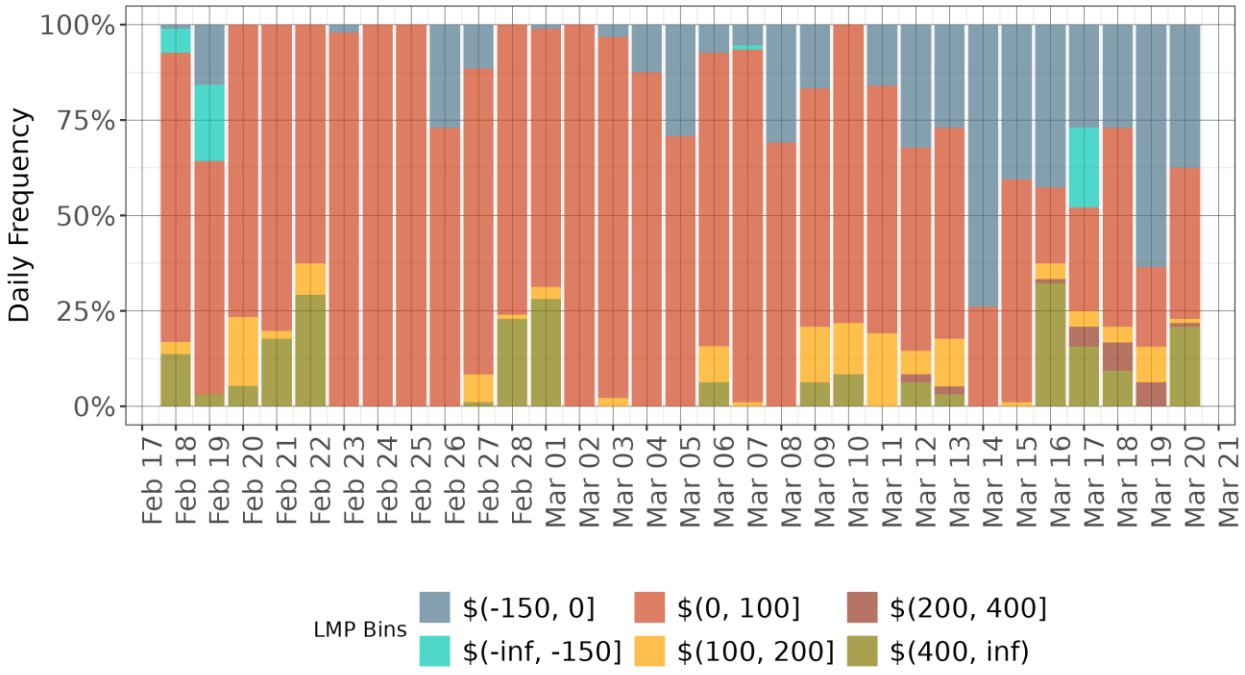
Figure 6 shows the daily average ELAP locational marginal prices (LMPs) for the fifteen-minute market and the five-minute market. The average daily prices from February 18 through March 20, 2026 in the fifteen-minute market were between -$19.66/MWh and $325.92/MWh. The average five-minute prices were between -$36.64/MWh and $805.90/MWh.

Figure 6: Daily average of fifteen-minute market and five-minute market prices



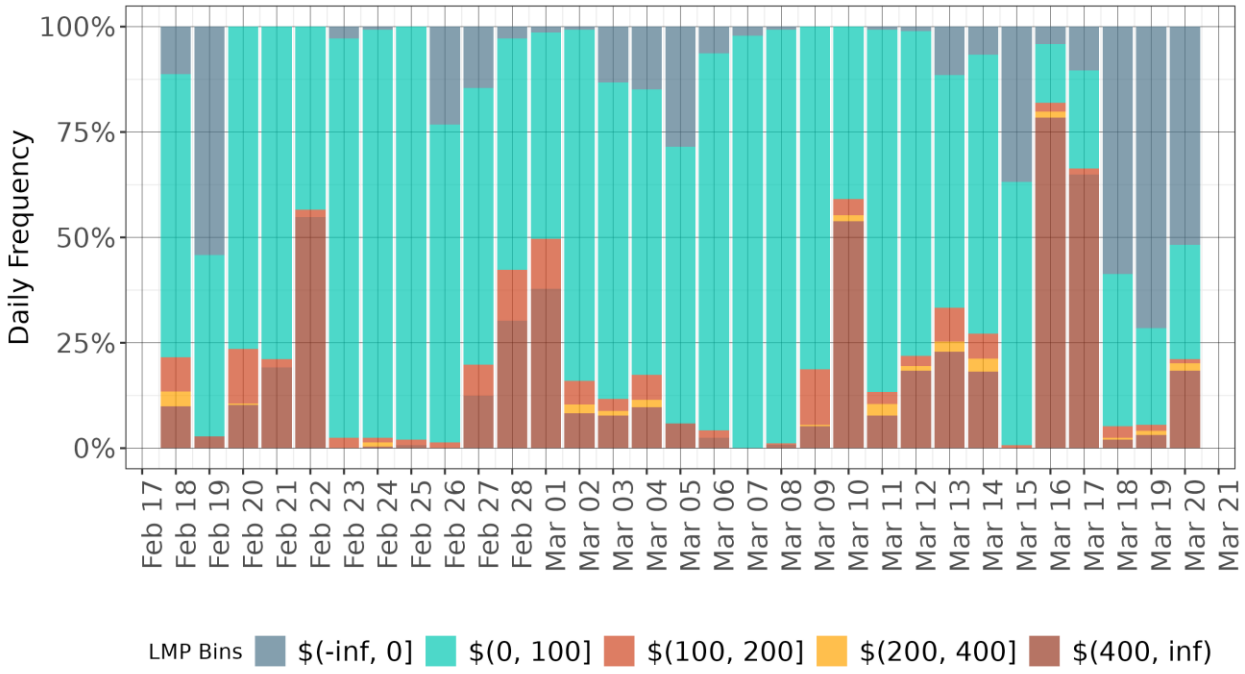
Figures 7 and 8 show the FMM and RTD ELAP prices for the BHBA BAA classified by price bins.

Figure 7: Daily frequency of fifteen-minute prices organized by price ranges



For all trade dates from February 18 through March 20, 2026 about 67.6 percent of the FMM intervals observed prices were between $0/MWh and $100/MWh. At the same time, 64.8 percent of the five-minute prices were between $0/MWh and $100/MWh.

Figure 8: Daily frequency of five-minute prices organized by price ranges



Market Validation Items

1. Data Issues
   The first couple weeks of parallel operations saw various data issues causing bids and base schedules to be unavailable in the market application, which in turn led to infeasibilities and RSE test failures. For example, BHBA successfully submitted bids on February 19 via SIBR but ISO-side issues resulted in the bids not being processed by the market application such. Bids were missing for the entire trade date of February 19, causing every single BHBA resource to be non-participating. At other times, BHBA could not submit base schedules via BSAP due to server storage issues on the ISO side. The various data issues have been resolved by the ISO team, and BHBA's RSE test performance has improved throughout parallel operations (e.g., zero RSE test failures and infeasibilities on March 20).

2. Exporting during infeasibilities
   A WEIM BAA should not have EIM transfers in the export direction on net when there are under-gen infeasibilities; power balance relaxation constraints specified in the EDAM BPM allow either exports or under-gen infeasibilities but not both. However, both exports and under-gen infeasibilities were observed for BHBA on March 16 and 17 – the software issue is being explored with the vendor.

3. Persistence forecasting + telemetry simulator
   Persistence forecasting was turned on for WEIM entities while the telemetry simulator was active, causing significant divergences of RTD schedules from FMM schedules. The combination of persistence forecasting and simulated telemetry often resulted in lower than expected RTD schedules and RTD-only infeasibilities. As of March 18, the Stage environment will no longer have persistence forecasting when the telemetry simulator is active.

4. Stage environment set-up
   There are multiple intervals in which BHBA sees high FMM/RTD ELAPs without infeasibilities, due partly to the set-up of the Stage environment. First, there were fewer bids in the Stage environment relative to the Production environment. ISO is gradually working to sync the bid sets available between the two sets, but a smaller bid set in the Stage environment can lead to tight supply conditions that may not occur in the Production environment. At the same time, EIM transfer limits between BAA were higher in the Stage environment than in the Production environment, allowing large infeasibilities in one WEIM BAA to draw power maximally from BHBA and other WEIM entities – this led to counterintuitive results such as BHBA exporting energy to PACE when BHBA ELAPs were high. ISO is continuing to evaluate EIM Transfer limit differences between the two environments to support both BHBA and EDAM parallel operations.

Conclusion

The ISO validated both prices and schedules based on input data fed through the market systems parallel operations from February 18 through March 20, 2026. This validation demonstrates that the market solution was produced as expected and is consistent with the market rules as designed, recognizing that the input data may be influenced by limitations inherent in the parallel operating environment and these limitations may affect the quality of the solution. When factors affecting staffing and input data are fixed or controlled for, the quality of the market solutions are as expected and indicate that the systems and processes of BHBA can transition and operate in WEIM production.