



Stakeholder Comments Template

Market Performance and Planning Forum Q3

The Stakeholder meeting presentation and other information related to this initiative may be found on the initiative webpage at: [Meetings | Market Performance and Planning Forum | California ISO](#)

Upon completion of this template, please submit it to ISOSTakeholderAffairs@caiso.com.

Submissions are requested by close of business on **August 13, 2026**.

Submitted by	Organization	Date Submitted
Jordan Miner jordan.miner@cpuc.ca.gov	CPUC – Energy Division	08/12/2026

1. Please provide your organization’s overall feedback on the discussion regarding the Monthly Extended Day-Ahead Market (EDAM) June Performance Report during the Market Performance and Planning Forum Q3 meeting on July 30, 2026.

Energy Division staff (ED staff or staff) of the California Public Utilities Commission (CPUC) develops and administers energy policy and programs to serve the public interest, advises the CPUC, and ensures compliance with CPUC decisions and statutory mandates. ED staff provides objective and expert analyses that promote reliable, safe, and environmentally sound energy services at just and reasonable rates for the people of California.

ED staff appreciates the opportunity to submit comments on the July 30th Market Performance and Planning. ED staff has a number of questions regarding 1) EDAM performance since go-live and 2) performance data more generally, as discussed in more detail below.

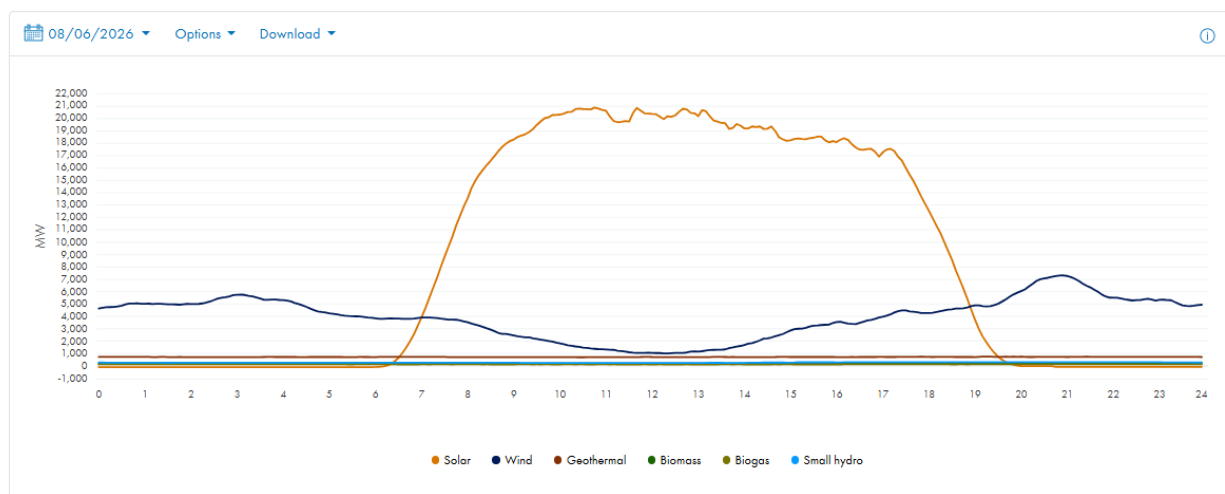
CAISO’s Balancing Authority Area (BAA) Supply Stack. It is ED staff’s understanding that the renewable supply stack, as shown below, includes out-of-state wind resources, such as SunZia. However, it does not appear that the aggregated supply stack includes other out-of-state resources dedicated to the CAISO, such as Palo Verde and Hoover. For example, the supply stack seems to show the nuclear resources at roughly 2,200 MW, which would include only Diablo Canyon and not the portion of Palo Verde owned by CA IOUs. It seems inconsistent to include out of state wind, but not other out of state resources dedicated to the CAISO, including portions of Palo Verde, Hoover, etc. ED staff is concerned that this overall framing would make it look like CAISO is importing more and exporting less than is

CAISO Public

actually the case, and would misrepresent the CAISO BAA's reliance on out-of-state resources, as opposed to its reliance on out-of-state resources fully dedicated to the CAISO BAA. ED staff requests that CAISO's ISO Today and other reporting use a consistent approach to resources that have resource ID's identified as dedicated imports, typically psuedotied and dynamically scheduled, but with CAISO-specific resources IDs. As shown in the Table below, there are over 6,165 MW of resources with Resource Type = "TG", sometimes with IDs ending in _DYN that have come online since 1/1/2020. Since not all of these resources are 100% dedicated to the CAISO, there might need to be an additional master file identifier that shows the portion of the resource ID dedicated to the CAISO.

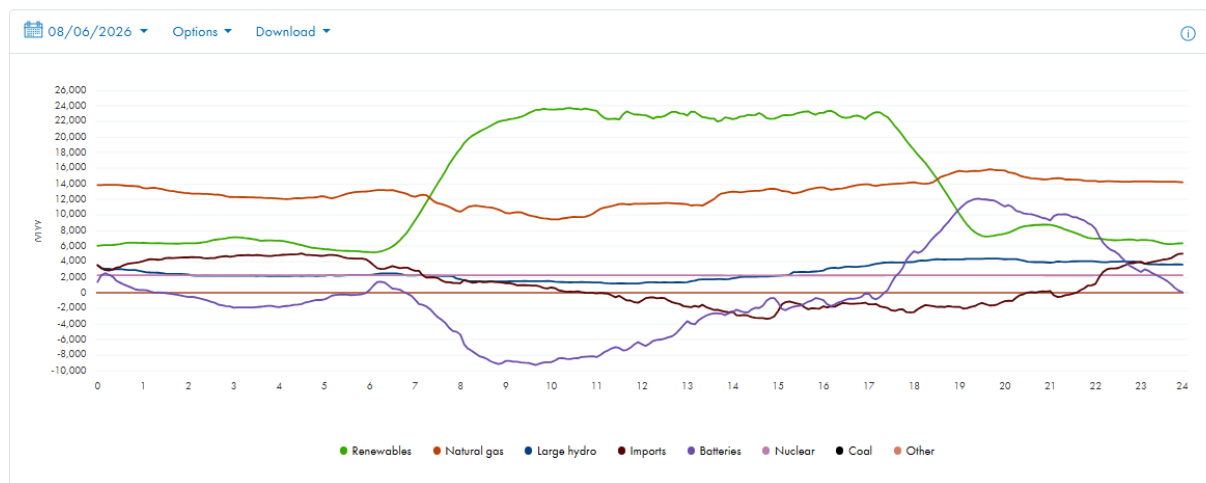
Renewables trend

Power separated by renewable resource, on a 5-minute average.



Supply trend

Power separated by resource, on a 5-minute average.



Energy Source	CAISO Gen Unit Name	Resource ID	Resource Type	Commercial Oper Date	NDC
WIND	SunZia Wind North	SZWDN_3_SZWX6	TG	5/19/2026	1,089.00
WIND	SunZia Wind South	SZWDS_3_SZWX14	TG	5/19/2026	2,561.20
LESR	Sun Pond Storage 1	SUNPND_5_SPSBT1	TG	3/27/2026	42.5
LESR	Sun Pond Storage 2	SUNPND_5_SPSBT2	TG	3/27/2026	42.5
SUN	Sun Pond Solar 1	SUNPND_5_SPSSR1	TG	3/27/2026	42.5
SUN	Sun Pond Solar 2	SUNPND_5_SPSSR2	TG	3/27/2026	42.5
HYBD	North Brawley Solar	ARLEAF_2_NBSSB1	TG	12/23/2025	35
NATURAL GAS	INTMNT_PASA_UNIT4	INTMNT_3_CC_4_PASADENA	TG	12/9/2025	31
NATURAL GAS	Intermountain; Unit 4 RVS Share	INTMNT_3_CC_4_RIVERSIDE	TG	12/9/2025	39
NATURAL GAS	Intermountain Generating Station U	INTMNT_3_CC_4_ANAHEIM	TG	12/9/2025	67
NATURAL GAS	Intermountain; Unit 3 PASA Share	INTMNT_3_CC_3_PASADENA	TG	10/11/2025	31
NATURAL GAS	Intermountain; Unit 3 RVS Share	INTMNT_3_CC_3_RIVERSIDE	TG	10/11/2025	39
NATURAL GAS	Intermountain Generating Station U	INTMNT_3_CC_3_ANAHEIM	TG	10/20/2025	67
SUN	Harq	DLN_5_HARQSCEDYN	TG	4/19/2025	150
LESR	VIKINGS CO-LOCATED BESS	VIKING_2_VCBBT1	TG	11/11/2024	149.88
SUN	VIKINGS CO-LOCATED PV	VIKING_2_VCSSR1	TG	11/11/2024	132.1
HYBD	Ocotillo Wells Solar and BESS	OCOTLO_6_OCWSB1	TG	9/1/2023	49.89
GEOHERMAL	Heber 2	SIGHEB_6_HE2SCEDYN	TG	12/20/2022	30
SUN	Wister Solar	WISTER_2_WISSR1	TG	7/12/2022	20
GEOHERMAL	Heber South	SIGHEB_6_MIRDYN	TG	12/29/2021	18
WIND	DURAN MESA	DURNMESA_3_WBDYN	TG	12/2/2021	105.08
WIND	CLINES CORNERS	CLINESCO_3_PVDYN	TG	12/1/2021	129.94
WIND	CLINES CORNERS B	CLINESCO_3_WBDYN	TG	12/1/2021	194.28
WIND	TECOLOTE WIND	TECOLOTE_3_WBDYN	TG	12/1/2021	271.68
HYBD	Townsite Solar BESS	TOWNSITE_2_MEADDYN	TG	12/17/2021	90
SUN	Titan Solar 1 Pseudo	TITANS_2_TTSSR1	TG	12/17/2020	70
WIND	White Hills A	WHITEH_2_MEADDYN1	TG	12/16/2020	50
WIND	White Hills B	WHITEH_2_MEADDYN2	TG	12/16/2020	300
NATURAL GAS	Sutter Power Plant Pseudo-CISO	SUTTER_2_CISO	TG	7/10/2020	275
Subtotal COD					6,165.05

1. **CAISO's Load Adjustment for "IRU Deficiency" on June 11th.** CAISO's Market Performance and Planning Forum slide 36 states that, "RUC [reliability capacity up] adjustments were applied for CAISO in 19 total hours across June 11 and June 12 up to a maximum of 810 MW. No adjustments were made for other BAAs." On CAISO's Open Access Same-time Information System (OASIS), CAISO reports these RUC load adjustments for June 11th were due to "IRU deficiencies," as shown in the figure below. However, based on ED staff's analysis, it does not appear that there were IRU (Imbalance Reserve Up) deficiencies, as shown in the table below.

California ISO OASIS

Market/Process: RUC BAA Group ID: [ALL]

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Load Adjustments

Market Balancing Authority Area Group ID ↑ Opr Date ↑ Hour Ending ↑ Interval ↑ Load Adjustment(MW) Load Adjustment Reason ↑

Market Balancing Authority	Area Group ID	Opr Date	Hour Ending	Interval	Load Adjustment(MW)	Load Adjustment Reason
RUC	CISO	08/11/2026	1	0	0	IRU Deficiency
RUC	CISO	08/11/2026	2	0	0	IRU Deficiency
RUC	CISO	08/11/2026	3	0	0	IRU Deficiency
RUC	CISO	08/11/2026	4	0	0	IRU Deficiency
RUC	CISO	08/11/2026	5	0	0	IRU Deficiency
RUC	CISO	08/11/2026	6	0	0	IRU Deficiency
RUC	CISO	08/11/2026	7	0	0	IRU Deficiency
RUC	CISO	08/11/2026	8	0	0	IRU Deficiency
RUC	CISO	08/11/2026	9	0	273.5	IRU Deficiency
RUC	CISO	08/11/2026	10	0	136	IRU Deficiency
RUC	CISO	08/11/2026	11	0	810	IRU Deficiency
RUC	CISO	08/11/2026	12	0	747	IRU Deficiency
RUC	CISO	08/11/2026	13	0	596.5	IRU Deficiency
RUC	CISO	08/11/2026	14	0	592.5	IRU Deficiency
RUC	CISO	08/11/2026	15	0	212	IRU Deficiency
RUC	CISO	08/11/2026	16	0	40	IRU Deficiency
RUC	CISO	08/11/2026	17	0	0	IRU Deficiency
RUC	CISO	08/11/2026	18	0	182	IRU Deficiency
RUC	CISO	08/11/2026	19	0	0	IRU Deficiency
RUC	CISO	08/11/2026	20	0	0	IRU Deficiency

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BAA	IRU Requirement for HE 14	IRU Award for HE 14	Excess/Shortage
CAISO	874.53	1,017.13	142.60
PACE	439.51	339.51	-100.00
PACW	42.50	0	-42.50
Total	1,356.54	1,356.64	0.10

Thus, it is not clear why CAISO made a 592.50 MW load adjustment for HE14 (and other hours), when it does not appear that there was an IRU deficiency. ED staff understands that Operating Procedure (OP) 1210 requires CAISO to procure 100 percent of the IRU requirement at the 97.5 percent level when load exceeds 42,000 MW, but the day-ahead load forecast for June 11th was 37,000 MW. Therefore, it would be helpful if CAISO could explain the reason for the RUC load adjustments on June 11th, specifically for HE14, but for the other hours as well.

2. **CAISO's Load Adjustment for "IRU Deficiency" on August 4th.** Similar to the last question, CAISO made very large RUC adjustments for IRU deficiencies on 8/4 (see figure below). ED staff had assumed that these adjustments were because of CAISO OP1210, which requires CAISO to procure IRU at the 97.5 percent uncertainty level, but the adjustments shown below seem larger than one would expect, based on the analysis shown in the table below.

California ISO OASIS

Market/Process: RUC BAA Group ID: [ALL]

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Load Adjustments

Market	Balancing Authority	Area Group ID	Opr Date	Hour Ending	Interval	Load Adjustment(MW)	Load Adjustment Reason
CISO	CISO		08/04/2026	1	0	0	IRU Deficiency
RUC	CISO		08/04/2026	2	0	0	IRU Deficiency
RUC	CISO		08/04/2026	3	0	0	IRU Deficiency
RUC	CISO		08/04/2026	4	0	0	IRU Deficiency
RUC	CISO		08/04/2026	5	0	0	IRU Deficiency
RUC	CISO		08/04/2026	6	0	0	IRU Deficiency
RUC	CISO		08/04/2026	7	0	1795	IRU Deficiency
RUC	CISO		08/04/2026	8	0	1182	IRU Deficiency
RUC	CISO		08/04/2026	9	0	2762	IRU Deficiency
RUC	CISO		08/04/2026	10	0	3011	IRU Deficiency
RUC	CISO		08/04/2026	11	0	3218	IRU Deficiency
RUC	CISO		08/04/2026	12	0	2288	IRU Deficiency
RUC	CISO		08/04/2026	13	0	1492	IRU Deficiency
RUC	CISO		08/04/2026	14	0	1270	IRU Deficiency
RUC	CISO		08/04/2026	15	0	1273	IRU Deficiency
RUC	CISO		08/04/2026	16	0	1328	IRU Deficiency
RUC	CISO		08/04/2026	17	0	2188	IRU Deficiency
RUC	CISO		08/04/2026	18	0	3590	IRU Deficiency
RUC	CISO		08/04/2026	19	0	1193	IRU Deficiency
RUC	CISO		08/04/2026	20	0	1617	IRU Deficiency

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BAA	IRU Requirement for HE 18	IRU Award for HE 18	Excess/Shortage
CAISO	896.12	1,215.58	319.46
PACE	275.59	0	-275.59
PACW	43.68	0	-43.68
Total	1,215.39	1,215.58	0

Thus, for the 90 percent uncertainty requirement, it appears that the system is fully resourced, with the CAISO long position equaling PACE and PACW short position. However, CAISO procured an additional 3,590 MW for HE18 on August 4, which is 4 times as much of the requirement. It is difficult to understand how moving from the 90 percent uncertainty to the 97.5 percent uncertainty would increase the requirement nearly fivefold (i.e., from ~900 MW to 4,400, or ~900 MW + ~3600 MW). It would be helpful if CAISO could explain how it arrived at the IRU deficiencies on August 4.

- 3. The 97.5 Percent Uncertainty Level for IRU.** It would be helpful if CAISO could identify where in OASIS it provides the 97.5 percent uncertainty quantity. If this is the histogram, can CAISO explain how to use it (e.g., does one use the net demand or need to sum certain figures)?
- 4. Counterfactual Market Results.** At either the Western Energy Markets (WEM) or the Joint WEM/CAISO Board meeting, one of the board members asked whether CAISO

had run a counterfactual comparing the CAISO day-ahead market results with the EDAM day-ahead market results and CAISO indicated that it had done so. Would it be possible for CAISO to provide these results at the next Market Performance and Planning meeting?

5. **Hourly Virtuals or Hourly Net Virtuals.** Can CAISO explain whether it is possible to determine virtual supply and virtual demand that clears on an hourly basis from the information posted on OASIS? If not, would it be possible to post this information? In addition, can CAISO explain whether it is possible to determine net virtual supply from OASIS, under “Energy Schedule, System Load and Resource Schedules” (i.e., are net virtuals = load + exports - generation – imports)? And if not, why not?
6. **Availability of IRU in the Real-Time.** In its presentation, CAISO indicated that the availability for IRU in the real-time is only 80 percent. Can CAISO explain why this occurs?
7. **Cost Attribution for RCU.** Is there any way to tell from OASIS data reporting if RCU is procured because of underbid load or because of net virtual supply? If so, can CAISO provide an explanation of how this is done? If not, could CAISO include this in its monthly reports?
8. **Color Coding in the Market Performance and Planning Forum Presentation.** Could CAISO use consistent color classification treatment on slides 23 and 29? Having different colors makes it difficult to compare the BAAs each against other when color coding is different for the same data across the BAAs.