California ISO

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
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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.

Powerex appreciates the California ISO's efforts to provide information regarding the performance of EDAM. These comments focus on information in the monthly report related to the collection and allocation of congestion revenues, and on the value and allocation of transfer revenues.

Reporting of Congestion Revenue Based on the Area Where Market Participants Paid the Congestion Cost

At page 124, the report states that "[t]otal EDAM congestion revenues in June were $37.9M." Figure 131 provides the daily congestion revenues, based on "where the congestion is sourced," which Powerex understands to refer to the BAA where the binding constraints producing the congestion revenue are located. Virtually all of the June total is reported as being sourced from constraints located in the California ISO BAA, which is consistent with historical analyses of WEIM data published by the California ISO in other stakeholder proceedings.

The report also provides information on the allocation of congestion revenues under the transitional approach, which allocates congestion back "to the areas where market participants paid the congestion costs … if they are associated with exercised transmission rights and self-scheduled transactions." Under this transitional methodology, the report states that "Returns to PAC areas from CISO congestion totaled $1.34M in May and $1.33M in June."

Powerex appreciates the reporting of the total congestion revenues collected by market settlements, and the allocation of those revenues under the current transitional approach. Powerex would appreciate more information, however, as it is unclear how much of the

$37.6 million in congestion revenues associated with constraints in the California ISO BAA were paid by market participants in PacifiCorp West and in PacifiCorp East.

Figure 132 of the report is described as providing "the breakdown of net-total congestion rents in the CISO area associated with parallel [flows] from PAC areas." These "net-total congestion rents" are reported as $598k and $958k in May and June, respectively. It is unclear whether this is intended to reflect the total congestion paid in PAC associated with parallel flows, or whether it represents the parallel flow congestion costs paid by market participants in PacifiCorp *after* accounting for the transitional allocation.

This ambiguity makes it difficult to evaluate the extent to which the $1.34 million and $1.33 million returned to PacifiCorp in May and June offset the new congestion payments made by PacifiCorp customers to the California ISO as a result of participating in EDAM.

Powerex requests that future monthly EDAM performance reports more clearly break down the total congestion revenues by the area where market participants paid the congestion costs. Specifically, Powerex requests that the report contain (1) the parallel flow congestion costs paid by market participants in PacifiCorp's area as a result of settling generation and demand at the applicable LMP; and (2) any offsets to those costs returned to each PacifiCorp area under the transitional allocation. Ideally this would be further categorized by the congestion costs associated with the scheduled use of firm OATT rights and congestion revenues associated with other EDAM transactions. This information will help inform stakeholders evaluating potential proposed changes to the transitional allocation.

Reconciliation of Different Congestion Estimates

Table 9, on page 119, reports the "Average MCC ($/MWh)" for the DLAP or ELAP associated with PacifiCorp West, PacifiCorp East, PG&E and SCE. Table 11, on page 121, "reconstruct[s] the monthly average MCC in the previous figure, but with a breakdown where the congestion is occurring." The values in Table 11 do not add up to the values in Table 9, however, and in certain instances the differences appear to be large. For example, Table 9 reports that the average MCC for PACE in May was -$0.8/MWh, whereas Table 11 appears to show constraint- and case-specific contributions to that MCC that sum up to -$0.2/MWh.

Powerex asks the California ISO to clarify whether the components in Table 11 should, in fact, sum up to the value in Table 9. If so, then Powerex suggests that revised numbers be provided with the next monthly report. If not, then Powerex suggests that the report provide additional explanation to clarify the different concepts being presented.

Reporting of EDAM Transfer Revenues

The report contains extensive information regarding the volume of EDAM transfers, but contains no information regarding the value of these transfers or any associated transfer revenue. The Marginal Cost of Energy in different EDAM BAAs can and has diverged, sometimes significantly, implying the collection of transfer revenue that, under the EDAM tariff, is split between the EDAM entities on either side of the transfer.

Powerex requests that future monthly reports contain information on the value and allocation of EDAM transfers between BAAs.