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.

   The Six Cities appreciate the dedicated efforts of the CAISO staff to achieve a generally smooth launch of the Extended Day-Ahead Market (“EDAM”) and parallel implementation of the Day-Ahead Market Enhancements (“DAME”). In the Six Cities’ experience, market operations have remained reliable. Although the Six Cities, like many market participants, have experienced a significant number of settlements issues, CAISO settlements personnel have been diligent in addressing the problems, and the Six Cities have seen substantial progress in resolving errors and unintended consequences.

   The economic impact of the EDAM remains uncertain. As noted at Slide 40 of the presentation for the July 30, 2026 Market Performance and Planning Forum, the EDAM thus far has had no significant impact on total market costs. This observation is consistent with the gross EDAM benefits reported in the Western Energy Markets Quarterly Benefits Report for the 2nd Quarter of 2026 (“the 2nd Qtr. Benefits Report”), available at western-energy-markets-quarterly-benefits-report-q2-2026.pdf. According to that report at page 9, EDAM gross benefits for May and June totalled $11.38 million for the entire market. Of the total amount, gross benefits to the CAISO BAA were $5.96 million. However, as reported at Slide 47 of the July 30th presentation, the CAISO BAA transferred $2.67 million in congestion revenues to PacifiCorp, amounting to about 45% of the attributed gross benefits.

The negligible benefits from the initial two months of EDAM operations contrast sharply with reported benefits to the CAISO and PAC BAAs associated with the Western Imbalance Energy Market ("WEIM") for the same months. WEIM benefits attributed to the CAISO BAA for May and June totalled $22.65 million, and WEIM benefits to the PAC BAA for the same months totalled $24.01 million. 2nd Qtr. Benefits Report at 9. In total, WEIM benefits to the two BAAs (associated with approximately 10% of total energy transactions) were 4 times the EDAM benefits (associated with approximately 90% of total energy transactions).

The Six Cities recognize that the benefits associated with the initial two months of EDAM operations may not be representative of outcomes for a longer time period or a more expansive EDAM footprint. At the same time, the development and implementation of the EDAM design have required extremely high resource commitments by the CAISO itself and by the market participants participating in the markets. An ongoing comparison of costs and benefits is a critical input for guiding prioritization of potential enhancements to the EDAM design as compared with initiatives focused on possible changes to Real-Time market elements or resource development and procurement. In addition, a comparison of costs and benefits accruing to the BAAs participating in the EDAM and the WEIM should guide the allocation of responsibility for market costs going forward. Benefits received from participating in either or both of the EDAM and WEIM should be at least roughly proportional to responsibility for market costs. Accordingly, the Six Cities request that the CAISO include in subsequent reports on EDAM performance: (1) estimates of gross benefits received by each participating BAA expressed both in total dollars and in $/MW of peak BAA load, and (2) market participation charges collected from each participating BAA by market (EDAM and WEIM), also expressed both in total dollars and in $/MW of peak BAA load.

The Six Cities also request that subsequent EDAM performance reports include additional analysis of the relationships between Imbalance Reserve ("IR") procurement (including costs of procured IR) and utilization of the resources procured for IR to address uncertainty realized in real-time. Slide 26 of the July 30th presentation reported that capacity procured for IR was utilized to address uncertainty only to a very limited extent. This appears to raise the question whether the procurement metrics for IR are properly targeted to achieve value from IR products commensurate with payments to procured IR resources.