



March 2, 2021

The Honorable Kimberly D. Bose
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 the Public Service Company of
New Mexico's Participation in the EIM
Docket No. ER15-861-000**

Dear Secretary Bose:

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 the Public Service Company of New Mexico (PNM), has determined that, following market simulation and an adequate period of parallel operations, the CAISO and PNM 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 of Power System and Market Technology, and the sworn PNM affidavit of Chris Olson, Senior Vice President, Utility Operations. This filing certifies the readiness of the CAISO and PNM to proceed with PNM's participation in the CAISO's Energy Imbalance Market (EIM) on April 1, 2021, without exception, consistent with the requirement to do so at least 30 days prior.

I. Background

The EIM provides other balancing authority areas the opportunity to participate in the real-time market for imbalance energy that the CAISO operates in its own balancing authority area. PacifiCorp's balancing authorities were the first two balancing authorities to join the EIM beyond the CAISO balancing authority area. The CAISO's

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).

EIM 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 EIM entity in production.⁴ Accordingly, the Commission directed the CAISO to include provisions in its tariff to ensure the readiness of any new EIM 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 EIM entity attesting that both have prepared and made ready the systems and processes for the new EIM entity to commence financially binding participation in the EIM.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 PNM ran market simulation scenarios from November 3, 2020 to January 29, 2021. Parallel (*i.e.*, financially nonbinding) operations, which began on January 30, 2021, will run through at least March 2, 2021 and, in any event, will continue to be supported and available to PNM until April 1, 2021. During market simulation and parallel operations, the CAISO and PNM 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 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 officers who have attested that the parties' processes and systems are ready for PNM's participation in the EIM.

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 the CAISO and PNM to validate

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 *Id.* at P 30.

⁵ *Id.* n.85.

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

⁷ More information on the status of these other reports consistent with CAISO tariff section 29.2(b)(8) is available on the CAISO website under the EIM Entities PNM entry for 2021 at: <http://www.caiso.com/informed/Pages/ReleasePlanning/Default.aspx>.

performance of the systems and processes under a variety of structured scenarios. The market simulation dashboard dated January 29, 2021 demonstrated that the CAISO and PNM were ready to enter parallel operations. Having achieved the benefits from market simulation, the CAISO and PNM transitioned to parallel operations on January 30, 2021.

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. The CAISO and PNM 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 PNM to understand the interaction between resource plans, base schedules, outage management, manual dispatch, and the CAISO full network model. This period has also allowed the CAISO and PNM to identify and resolve software issues. The dashboard dated February 15, 2021 showed the progress during initial parallel operations as additional readiness criteria were met. The final dashboard, dated February 25, 2021, is included as Attachment A. The dashboard sets 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 PNM's compliance with criteria. The dashboard shows that all readiness criteria have been satisfied or will be satisfied by April 1, 2021.

Section 29(b)(6) requires that a senior officer of the CAISO and a prospective EIM entity attest (1) that the processes and systems of the prospective EIM 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 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 of Power System and Market Technology and the sworn PNM affidavit of Chris Olson, Senior Vice President, Utility Operations in satisfaction of this requirement.

The affidavits are based upon the engagement by these senior officers 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 PNM is prepared to enter financially binding production EIM operations on April 1, 2021. 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 the CAISO nor PNM has identified any exception to any of the readiness criteria.

III. Market Quality Report on Parallel Operations

Parallel operations allowed the CAISO and PNM to identify and resolve numerous input, process, and software issues prior to the commencement of financially binding operations.⁸ The CAISO and PNM 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 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 17 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 and indicates that the systems and processes of PNM are ready to operate in production.

IV. Attachments

Besides this transmittal letter, this filing includes these attachments:

- Attachment A: Readiness Dashboard Report
- Attachment B: Affidavit of Khaled Abdul-Rahman
- Attachment C: Affidavit of Chris Olson
- Attachment D: Parallel Operations Market Quality Report

⁸ The market quality report on parallel operations dated February 26, 2021 explains how each of these issues impacted the market results and how they were resolved by the CAISO and PNM.

V. Conclusion

The CAISO respectfully requests that the Commission accept this certification as consistent with section 29.2(b)(6) of the CAISO tariff. The CAISO or PNM will notify the Commission in the event of any subsequent determination that the implementation of PNM into the EIM on April 1, 2021 should be delayed, the reason for the delay, the new implementation date if it can be determined, and whether a portion or all of this certification needs to be reissued.

Respectfully submitted,

By: /s/ John C. Anders

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Attachment A – Readiness Dashboard Report

Informational Readiness Certification for the

Public Service Company of New Mexico’s

Participation in the Energy Imbalance Market

California Independent Systems Operator Corporation

March 2, 2021

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
1	Prospective EIM Entity Full Network Model Integration	Generation, Interchange and Load comparison	Load, EIM Internal Intertie and EIM External Interties, and Generating Unit definition in the Full Network Model is consistent with the Load, EIM Internal Intertie and EIM External Interties, and Generating Unit definition in the exported prospective EIM 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 provided reports indicating that the Generating Unit, Intertie and Load definition in the CAISO's Full Network Model is consistent with the network modeling information in the PNM network model.	Tariff section 29.2(b)(7)(A)(i)
2	Prospective EIM Entity Full Network Model Integration	Comparison of SCADA measurement	SCADA measurements used in prospective EIM 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 provided reports indicating critical and used SCADA measurements PNM is publishing to the values seen by the CAISO.	Tariff section 29.2(b)(7)(A)(ii)
3	Prospective EIM Entity Full Network Model Integration	State Estimator solution	CAISO state estimator solution is equivalent or superior to the prospective EIM 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 provided reports CAISO State estimator has been solving on continuous basis on the CAISO EMS PROD system.	Tariff section 29.2(b)(7)(A)(iii)
4	Prospective EIM Entity Full Network Model Integration	Non-Conforming Load, Behind-the-Meter Generation, Pseudo Ties, and Dynamic Schedules	Physical representation of the prospective EIM 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 EIM Transfers and Real-Time Dispatch in the Energy Imbalance Market, as applicable	Prospective EIM Entity major non-conforming loads > 5% of prospective EIM Entity total actual load in MW are modeled separately from conforming load in market model	CAISO	Complete	PNM confirmed that the non-conforming loads have been modeled separately from the PNM conforming load and their associated hourly base schedules are submitted to BSAP. PNM confirms that the historical actual load measurements provided does not include the non-conforming load	Tariff section 29.2(b)(7)(A)(iv)
5	Agreements	Execution of Necessary Agreements	The prospective EIM Entity has executed all necessary agreements.	The prospective EIM Entity will execute all agreements, as outlined in Section 5 of the EIM BPM within the required timelines outlined in Section 5.	JOINT	Complete	All agreements are complete with executed agreements as evidence.	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 EIM Entity operators who will have responsibility for EIM operations, transactions and settlements, will complete CAISO training modules.	Prospective EIM 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.	PNM	Complete	PNM provided evidence that all necessary training has been completed.	Tariff section 29.2(b)(7)(B)
7	Forecasting Capability	Load forecast capability	Definition of EIM demand forecast boundaries based on the conforming and non-conforming load characteristics, as applicable. <ul style="list-style-type: none"> Accuracy of the CAISO forecast of EIM demand based on historical actual load data for the defined EIM 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	PNM provided screen shots from Forecast Monitoring showing accurate measurements to satisfy this criterion.	Tariff sections 29.2(b)(7)(C)(i)-(iii)
8	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. EIM Entity provides to CAISO real-time MW production PI tags.	CAISO	Complete	The ISO Short-Term Forecasting team provided screen shots from Forecast Monitoring showing accurate measurements to satisfy this criterion.	Tariff section 29.2(b)(7)(C)(iv)
9	Forecasting Capability	Flexible capacity requirements	CAISO has established flexible capacity requirements for the prospective EIM Entity Balancing Authority Area and the combined EIM Area including the prospective EIM Entity	The CAISO has received and stored all historical data from the prospective EIM Entity necessary and sufficient for the CAISO to perform the flexible ramp requirement.	CAISO	Complete	CAISO provided confirmation it received and stored all historical data sufficient for the CAISO to perform the flexible ramp requirement.	Tariff section 29.2(b)(7)(K)(iv)
10	Balanced Schedules	Base schedule balancing capability	The prospective EIM Entity Scheduling Coordinator demonstrates its ability to balance EIM demand and EIM supply for the prospective EIM 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 EIM Entity to indicate a reasonable threshold as it applies to a given EIM Entity and	PNM	Complete	PNM provided reports indicating that PNM has met the base schedule balancing criteria.	Tariff section 29.2(b)(7)(D)(i)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
				indicate the potential implications of a swing from 5% over to 5% under forecast in one hour to the next.				
11	Balanced Schedules	Flexible ramping sufficiency test capability	The prospective EIM 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.	PNM	Complete	CAISO provided reports indicating that PNM has met the flexible ramping sufficiency test (both Up and Down)	Tariff section 29.2(b)(7)(D)(iii)
12	Balanced Schedules	Capacity test capability	The prospective EIM 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 an EIM Entity to meet its capacity requirements.	CAISO	Complete	indicating that PNM has met the capacity test capability	Tariff section 29.2(b)(7)(D)(ii)
13	Operating Procedures	CAISO operating procedures (relevant to EIM operations)	The prospective EIM Entity signs CAISO non-disclosure agreement and receives appropriate CAISO “public” and “restricted” operating procedures	Operating procedures NDA signed by the prospective EIM Entity. The prospective EIM Entity receives CAISO operating procedures four months prior to the parallel operations date.	JOINT	Complete	Operating procedures have been shared with PNM	Tariff section 29.2(b)(7)(K)(i)
14	Operating Procedures	Prospective EIM Entity operating procedures	The prospective EIM Entity operating procedures are defined, updated, and tested for the EIM Entity Scheduling Coordinator	The prospective EIM Entity operating procedures are updated tested and implemented prior to parallel operations date.	PNM	Complete	PNM provided email and screen shots confirming that their operating procedures are complete and uploaded to Accellion	Tariff section 29.2(b)(7)(K)(ii)
15	System Readiness & Integration	Functional Testing	The prospective EIM 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.	PNM	Complete	PNM provided their EIM Test Results Summary document showing test cases have been executed and passed.	Tariff section 29.2(b)(7)(E)(i)
16	System Readiness & Integration	System Integration	The prospective EIM 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.	PNM	Complete	EIM Test Results Summary document showing all test cases have been executed and passed.	Tariff section 29.2(b)(7)(E)(ii)
17	System Readiness & Integration	The prospective EIM Entity system access complete	All prospective EIM Entity employees who require system access to perform EIM-related job functions identified and have necessary certificates.	All prospective EIM Employees performing job functions for EIM market are identified. All CAISO issued certificates are requested within the appropriate timeframes. All identified employees provided the necessary EIM system access certificates.	PNM	Complete	CAISO provided evidence that all necessary PNM staff have required access for Parallel Operations. PNM confirmed the access is in place and plan is in place for production.	Tariff section 29.2(b)(7)(E)(iii)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
18	System Readiness & Integration	ISO - prospective EIM Entity interfaces	Data interfaces between prospective EIM Entity's systems and CAISO systems are tested	ISO and prospective EIM Entity identify significant data interface issues. EIM Entity and CAISO executives to approve exceptions.	JOINT	Complete	PNM provided the testing timeline summary document reflecting that all interface testing completed	Tariff section 29.2(b)(7)(E)(i)
19	Market Simulation	Day in the life simulation	The prospective EIM Entity operators are able to meet the market timelines	The prospective EIM Entity grid operations staff complete end-to-end daily market workflow with no critical defects.	JOINT	Complete	PNM provided the testing timeline summary document reflecting that Day-In-The-Life testing was complete and successful.	Tariff section 29.2(b)(7)(I)(ii)
20	Market Simulation	Structured scenarios simulation	The prospective EIM 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	PNM and the ISO have successfully executed the operational components of all Structured Market Simulation Scenarios successfully. Evidence uploaded to the EIM Accellion site.	Tariff section 29.2(b)(7)(I)(iii)
21	Market Simulation	Unstructured scenarios simulation	The prospective EIM Entity operators execute and pass all unstructured scenarios provided by prospective EIM Entity	All significant issues resolved or have an interim solution that is functionally equivalent.	JOINT	Complete	PNM sent an email stating that all scenarios met their intended training during Market Simulation	Tariff section 29.2(b)(7)(I)(iv)
22	Market Simulation	Market results reports	Market results are appropriate based on inputs	The prospective EIM Entity and CAISO executive project sponsors approve the market results reports during market simulation	PNM	Complete	CAISO provided an email summarizing the market results during market simulation.	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	CAISO provided an email indicating Market simulation prices and MWs schedules/dispatches are validated by CAISO market quality team for entry into parallel operations	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	Parallel operations prices and schedules/dispatches are validated by the CAISO market quality team	Tariff section 29.2(b)(7)(I)(vi)
24	Market Simulation	The prospective EIM Entity Identification	Validation of SCID's and Resource ID's	The CAISO has established and the prospective EIM Entity has tested all necessary SCIDs and Resource IDs established for the prospective EIM Entity's Balancing Authority Area	JOINT	Complete	PNM provided the final updated schedule 1 form and an email confirming this criteria has been met.	Tariff section 29.2(b)(7)(I)(i)
25	Settlements	ISO Settlement Statements and Invoices published to the prospective EIM Entity and EIM 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	PNM provided evidence that they have completed validation of the settlement statements and invoices. CAISO Settlement lead confirmed.	Tariff section 29.2(b)(7)(F)(i)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
26	Settlements	The prospective EIM Entity settlement statements and invoices reflect accurate allocations to the prospective EIM Entity customers prior to financially binding operations.	Verification that settlement statements and invoices accurately reflects system and market data	The prospective EIM Entity settlement statements and invoices that allocate charges and credits to its customers accurately reflect system and market data during parallel operations.	JOINT	Complete	PNM provided an email stating that PNM doesn't have third party customers, therefore no allocation of charges and credits is performed or applicable to fPNM	Tariff section 29.2(b)(7)(F)(ii)
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 Market Validation and Analysis team and DMM provided confirmation they have sufficient data available.	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 EIM Entity specific parallel operation plan	Parallel operations runs consistently within normal production CAISO Market disruption tolerances.	CAISO	Complete	CAISO provided an email with supporting reports stating the CAISO has verified that the Parallel Operations ran consistently within normal CAISO disruption tolerances.	Tariff section 29.2(b)(7)(J)
29	Outage Management System	Transmission and generation outage submittal and retrieval	The prospective EIM Entity will verify its ability to submit and retrieve outage information with the CAISO	The prospective EIM 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	PNM submitted outages in the Map Stage environment. The CAISO confirmed that these were received and processed in the CAISO systems.	Tariff section 29.2(b)(7)(G)
30	Communications between the CAISO and the prospective EIM 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 EIM Entities business processes before the start of market simulation.	PNM	Complete	PNM sent email evidence that these processes are in place.	Tariff section 29.2(b)(7)(H)(i)
31	Communications between the CAISO and the prospective EIM Entity	Communication tools	Staff are trained on communication procedures and tools	The prospective EIM Entity operations staff who will have responsibility for EIM operations, transactions and settlements are trained on the relevant operating procedures and tools used for EIM related communications before the start of parallel operations	PNM	Complete	PNM sent email evidence that their staff has been trained on the communication procedures and tools	Tariff section 29.2(b)(7)(H)(ii)
32	Communications between the CAISO and the prospective EIM Entity	3 rd party transmission service provider	The third party transmission service provider information that supports EIM 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 EIM Entity through parallel operations	PNM	Complete	PNM provided an email confirming that PNM does not have any 3rd party transmission customers.	Tariff section 29.2(b)(7)(H)(iii)

Readiness Criterion Identifier	Readiness Category	Criteria	Measurable Elements	Threshold	Owner	Status	Evidence	Tariff Mapping
33	EIM Available Balancing Capacity	Identification of EIM Available Balancing Capacity	Participating resources and non-participating resources for EIM Available Balancing Capacity.	The prospective EIM Entity has identified EIM participating resources and non-participating resources that it intends to designate in the EIM Resource Plan as EIM Available Balancing Capacity	PNM	Complete	PNM provided an email PNM systems are capable of designating ABC capacity on our participating resources	Tariff section 29.2(b)(7)(K)(iii)

Attachment B – Affidavit of Khaled Abdul-Rahman

Informational Readiness Certification for the

Public Service Company of New Mexico’s

Participation in the Energy Imbalance Market

California Independent Systems Operator Corporation

March 2, 2021

Affidavit of Khaled Abdul-Rahman Certifying Readiness of Public Service Company of
New Mexico (PNM) Implementation in the Energy Imbalance Market

I, Khaled Abdul-Rahman, Vice President of Power Systems and Market Technology for the California Independent System Operator Corporation (CAISO), hereby certify as follows:

1. As the Vice President of Power Systems and Market Technology, I am responsible for the systems and processes that support and enable the Energy Imbalance Market and, as such, I have responsibility for the implementation of PNM 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 PNM's April 1, 2021 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 PNM will be ready to implement PNM's implementation in the Energy Imbalance Market on April 1, 2021.
4. I will ensure that the CAISO maintains resource commitments necessary to sustain readiness through April 1, 2021 and address any unexpected conditions that may arise before April 1, 2021 that could undermine grid operation or market operation within the existing EIM Area. I will continue to monitor progress and resolve any unexpected conditions that may arise.
5. Actual implementation of PNM on April 1, 2021 is conditioned upon the lack of any unexpected and unresolved issues that could undermine grid operation or market operation within the existing EIM Area. I will update this certification in the event any unexpected issues are not resolved as of April 1, 2021.

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



Khaled Abdul-Rahman, Vice President, Power Systems and
Market Technology

March 2, 2021

Attachment C – Affidavit of Chris Olson

Informational Readiness Certification for the

Public Service Company of New Mexico’s

Participation in the Energy Imbalance Market

California Independent Systems Operator Corporation

March 2, 2021

Affidavit of Chris Olson certifying readiness of the
Public Service Company of New Mexico (PNM) Implementation
in the Energy Imbalance Market

I, Chris Olson, Senior Vice President, Utility Operations, of PNM, hereby certify as follows:

1. As the Senior Vice President, Utility Operations, I am ultimately responsible to PNM for ensuring that all the systems and processes that support and enable the PNM Balancing Authority Area to participate in EIM are established and ready for EIM operations. As such, I have overall responsibility for the implementation of PNM'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 EIM have been satisfied or are expected to be satisfied as of PNM's April 1, 2021, 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 PNM will be ready to implement PNM's participation in the EIM on April 1, 2021.
4. I will ensure that PNM maintains resource commitments necessary to sustain readiness through April 1, 2021 and address any unexpected conditions that may arise before April 1, 2021 that could undermine grid operation or market operation within the existing EIM Area. I will continue to monitor progress and resolve any unexpected conditions that may arise.
5. Actual implementation of PNM's entry on April 1, 2021 is conditioned upon the lack of any unexpected and unresolved issues that could undermine grid operation or market operation within the existing EIM Area. I will update this certification in the event any unexpected issues are not resolved as of April 1, 2021.

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



Chris Olson
Senior Vice President, Utility Operations

February 26, 2021

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 2nd day of March, 2021.

/s/ Jacqueline Meredith

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