

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Portland General Electric Company    )**

**Docket No. ER25-1868-000**

**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO)<sup>1</sup> submits these comments supporting the proposed revisions to Portland General Electric Company's (PGE) Open Access Transmission Tariff (OATT) filed in this proceeding on April 3, 2025 (PGE OATT Filing).<sup>2</sup>

**I.     Summary**

The PGE OATT Filing will enable PGE's participation in the CAISO's Extended Day-Ahead Market (EDAM), in alignment with the provisions to implement EDAM under the CAISO Tariff approved by the Commission.<sup>3</sup> PGE's proposed OATT revisions are the culmination of a stakeholder effort that included coordination with the CAISO to develop the mechanisms and related OATT provisions required for PGE's participation in EDAM.

EDAM builds upon the Western Energy Imbalance Market (WEIM), which

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings set forth in Appendix A to the CAISO Tariff. The CAISO previously filed a doc-less motion to intervene in this proceeding on April 7, 2025.

<sup>2</sup> The CAISO files these comments pursuant to Rule 211 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.211. On April 18, 2025, the Commission issued a Notice Granting Motion for Extension of Time for the filing of comments, protests, and motions to intervene from April 24, 2025 until May 1, 2025.

<sup>3</sup> See *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,210 (2023) (DAME-EDAM Order); *Cal. Indep. Sys. Operator Corp.*, Commission letter order, Docket No. ER23-2686-001 (Apr. 30, 2024) (DAME-EDAM Compliance Order); *Cal. Indep. Sys. Operator Corp.*, 187 FERC ¶ 61,154 (2024) (EDAM Access Charge Order).

has been operating successfully for over a decade, has generated just shy of \$7 billion in cumulative benefits, and will continue to serve balancing areas participating in EDAM or remaining in the WEIM.<sup>4</sup> Just as PGE amended its OATT prior to participation in the WEIM, it now proposes incremental OATT revisions to maintain participation in the real-time market and to participate in the day-ahead market. This incremental approach has worked well and allows a balancing authority to remain in the WEIM and join EDAM when it decides that would be beneficial. The same spirit of collective collaboration that has made the WEIM a success applies to the implementation and future evolution of EDAM. The CAISO remains committed to continually enhancing the market design where warranted for the benefit of all market participants and stakeholders, and transparently addressing concerns that may arise.

The CAISO's primary objective throughout the PGE stakeholder process was to ensure the proposed OATT revisions aligned with the Commission-approved CAISO Tariff. For the reasons explained below, the CAISO supports PGE's OATT revisions as aligned with the requirements of the CAISO Tariff and urges the Commission to accept them as requested by PGE. The Commission has recognized the EDAM design is consistent with or superior to the Commission's *pro forma* OATT. Similarly, the Commission should find PGE's OATT revisions are consistent with or superior to the *pro forma* OATT.

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<sup>4</sup> The WEIM is sometimes also called the Energy Imbalance Market or EIM.

## **II. Background**

### **A. Amendments to the CAISO Tariff to Implement EDAM**

On August 22, 2023, the CAISO filed an amendment to the CAISO Tariff to implement the Day-Ahead Market Enhancements (DAME) and EDAM designs (August 2023 Filing).<sup>5</sup> The CAISO explained that, working together, the DAME and EDAM designs will support the optimal day-ahead commitment of a geographically diverse set of resources across an expanded market area, maximizing the use of available transmission capability and providing broad reliability, economic, and environmental benefits. Participants in the existing WEIM can choose voluntarily to join EDAM and settle all balancing area loads and resources in the day-ahead timeframe in addition to all imbalances between day-ahead positions and the real-time market.

On December 20, 2023, the Commission accepted almost all of the August 2023 Filing, including the bulk of the CAISO Tariff revisions to implement the EDAM design. The Commission found “the EDAM framework builds upon the existing CAISO day-ahead and WEIM framework to provide substantial economic benefits for customers from resource diversity and savings from replacing existing manual processes with CAISO’s automated process.”<sup>6</sup> As the Commission recognized, “EDAM is not a new market; rather, it takes advantage of CAISO’s existing day-ahead market by adding new procedures to accommodate the voluntary participation of other BAAs [balancing authority

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<sup>5</sup> The CAISO submitted the August 2023 Filing in Docket No. ER23-2686-000.

<sup>6</sup> DAME-EDAM Order at P 12.

areas].”<sup>7</sup> Furthermore, the Commission noted “EDAM will allow each balancing authority that voluntarily joins to transfer supply, Imbalance Reserves, and Reliability Capacity based upon the economic optimization of resources across a broad geographic area.”<sup>8</sup>

The Commission found that, “[a]s demonstrated in CAISO’s filing and as discussed in this order, DAME and EDAM have the potential to yield significant benefits to the voluntary WEIM and EDAM participants.”<sup>9</sup> Moreover, the Commission found “CAISO has demonstrated that its proposal presents a just and reasonable regional solution to expand the benefits of day-ahead market participation to existing WEIM participants and new entrants to both WEIM and EDAM,” and “EDAM has the potential to optimize the use of existing transmission and resources across a larger footprint in the West, which will provide economic and reliability benefits to participants.”<sup>10</sup> The Commission went on to state, “by leveraging a larger and more diverse set of resources across the Western Interconnection, we expect that DAME and EDAM will help CAISO and other EDAM participants to manage the impacts of increasing variable energy resources and extreme weather events in the region.”<sup>11</sup>

The only revisions to the CAISO Tariff the Commission did not initially accept in the DAME-EDAM Order were those regarding the proposed EDAM

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* at P 42.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

access charge, which the Commission rejected without prejudice, allowing the CAISO to submit additional support for its access charge proposal.<sup>12</sup> The CAISO submitted an amendment to the CAISO Tariff with additional support for the EDAM access charge on April 12, 2024.<sup>13</sup> The Commission accepted that CAISO Tariff amendment in the EDAM Access Charge Order issued on June 11, 2024.<sup>14</sup> This completed the CAISO Tariff elements to initially develop and implement EDAM, although the CAISO continues to work with stakeholders to identify and develop enhancements to the EDAM design.<sup>15</sup>

The EDAM provisions in the CAISO Tariff regarding onboarding and implementation activities have already gone into effect, pursuant to the DAME-EDAM Order, the DAME-EDAM Compliance Order, and the EDAM Access Charge Order.<sup>16</sup> These provisions support the activities of interested participants and the CAISO, working together, to implement EDAM. The CAISO currently expects DAME and EDAM will go live on May 1, 2026, and it will inform the

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<sup>12</sup> *Id.* at PP 460-65. The Commission also directed the CAISO submit a compliance filing that included certain corrections and clarifications. *See id.* at Ordering Paragraph (D). The CAISO submitted the compliance filing on February 16, 2024, and the Commission accepted it in the DAME-EDAM Compliance Order issued on April 30, 2024.

<sup>13</sup> The CAISO filed that CAISO Tariff amendment in Docket No. ER24-1746-000.

<sup>14</sup> *Cal. Indep. Sys. Operator Corp.*, 187 FERC ¶ 61,154.

<sup>15</sup> The CAISO subsequently filed an enhancement to the original EDAM design that extends support for inter-scheduling coordinator trades of energy within participating balancing areas, which the Commission accepted on December 23, 2024, effective as of the actual go-live date for EDAM. *See Cal. Indep. Sys. Operator Corp.*, 189 FERC ¶ 61,224 (2024). As discussed in these comments, the CAISO currently is undertaking an expedited stakeholder process narrowly focused on congestion revenue allocation arising from parallel flow effects across EDAM balancing areas resulting from internal flow-based transmission constraints in a neighboring balancing area. The issues being addressed in this stakeholder process solely involve the CAISO Tariff and thus are beyond the scope of this proceeding.

<sup>16</sup> *See* DAME-EDAM Order at Ordering Paragraph (A); DAME-EDAM Compliance Order at Appendix; EDAM Access Charge Order at Ordering Paragraph (A).

Commission of the actual go-live date within five business days after it occurs.<sup>17</sup>

## **B. The PGE OATT Filing**

In March 2024, PGE announced its intention to join EDAM and entered into an EDAM Entity Implementation Agreement with the CAISO on June 28, 2024.<sup>18</sup> The EDAM Entity Implementation Agreement contemplates that PGE, which is currently a participant in the WEIM, will develop changes to the PGE OATT as required to support EDAM participation.<sup>19</sup> PGE submitted its OATT Filing to fulfill this expectation. PGE accurately states:

Like its WEIM predecessor, participation in EDAM requires revisions not only to the CAISO Tariff but to the OATTs of transmission service providers joining EDAM. The CAISO EDAM tariff leaves implementing transmission service providers with certain decisions on how to implement EDAM participation under their respective OATTs. PGE's implementation decisions and associated OATT revisions appear further *infra*.<sup>20</sup>

The PGE OATT Filing contains the second set of revisions submitted by an entity to its OATT to allow its participation in EDAM, following PacifiCorp's earlier submittal of revisions to its own OATT to allow its EDAM participation that are currently pending before the Commission in Docket No. ER25-951.<sup>21</sup>

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<sup>17</sup> See DAME-EDAM Order at Ordering Paragraphs (B)-(C); DAME-EDAM Compliance Order at Appendix; EDAM Access Charge Order at Ordering Paragraphs (B)-(C).

<sup>18</sup> Transmittal letter for PGE OATT Filing at 9. The EDAM Entity Implementation Agreement between PGE and the CAISO is available on the Western Energy Market webpage at <https://www.westerneim.com/Documents/jun-28-2024-edam-entity-implementation-agreement-portland-general-electric.pdf>. See also *Cal. Indep. Sys. Operator Corp.*, 188 FERC ¶ 61,215 (2014) (granting waiver of CAISO Tariff to extend implementation date for PGE's participation as an EDAM entity).

<sup>19</sup> PGE EDAM Entity Implementation Agreement, Recital C.

<sup>20</sup> Transmittal letter for PGE OATT Filing at 7.

<sup>21</sup> See Docket No. ER25-951. In that proceeding, the CAISO has already filed comments supporting PacifiCorp's OATT revisions on February 18, 2025 and filed an answer to comments and protests on March 7, 2025 (March 7 CAISO Answer on PacifiCorp OATT Revisions). On

Regarding the PacifiCorp OATT revisions, PGE explains:

As PGE developed its own EDAM implementation plan and mapped out its Tariff language, it also closely followed PacifiCorp's tariff development process. PGE considered the extent to which PacifiCorp's tariff revisions would be appropriate for PGE, and in many cases, PGE has adopted the same EDAM implementation decisions and similar tariff language as PacifiCorp. For this reason, PGE has actively participated in PacifiCorp's pending stakeholder process and strongly supported PacifiCorp's pending EDAM filing in general. However, as noted below, despite general alignment, PGE's filing contains certain provisions unique to PGE and stands on its own as just and reasonable and consistent with or superior to the *pro forma* OATT.<sup>22</sup>

PGE explains that the WEIM has delivered over \$312 million in cost savings to PGE customers.<sup>23</sup> PGE also attaches to its OATT Filing a report, based on an analysis performed by The Brattle Group, that demonstrates "PGE's participation in EDAM could generate at least \$6 million in annual cost savings" and as much as \$17.5 million in annual cost savings.<sup>24</sup>

PGE requests the Commission to issue an order accepting the OATT revisions, without modification or condition.<sup>25</sup> PGE proposes to implement revised Attachment P-1 to the OATT (entitled EDAM Preparation Activities) as an initial step and later to implement the balance of the OATT revisions on PGE's

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March 27, 2025, Commission Staff issued a letter in the proceeding that directed PacifiCorp to provide additional information on certain aspects of its proposed OATT revisions. PacifiCorp filed its response on April 28, 2025, and the Commission established a due date of May 19, 2025 for comments regarding the PacifiCorp response. The CAISO expects to file comments on the PacifiCorp response.

<sup>22</sup> Transmittal letter for PGE OATT Filing at 8-9 (internal citation omitted).

<sup>23</sup> *Id.* at 18 n.53 (citing Western Energy Markets, *Benefits*, available at <https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx>).

<sup>24</sup> Transmittal letter for PGE OATT Filing at 4; PGE OATT Filing, Exh. No. PGE-003, *Portland General Electric Comparative Analysis of the CAISO's EDAM and the SPP's Markets+*, at 1, 12 (Mar. 21, 2024).

<sup>25</sup> Transmittal letter for PGE OATT Filing at 1, 37.

EDAM go-live date, with PGE informing the Commission of the actual go-live date within five business days after it occurs, which PGE expects will be in 2026.<sup>26</sup>

### III. Comments

The CAISO supports the PGE OATT Filing to allow PGE's participation as an EDAM entity and as an EDAM transmission service provider. The Commission has recognized EDAM's potential to yield significant benefits for the voluntary WEIM and EDAM participants. These will include benefits to PGE's customers, as the economic analysis provided by PGE also indicates. Commission acceptance of PGE's OATT revisions is necessary to allow PGE to participate in EDAM and thereby allow it to obtain these benefits.

Furthermore, the CAISO agrees with PGE that its OATT revisions are consistent with or superior to the Commission's *pro forma* OATT, and that the Commission should accept them as applied to the specific needs of PGE and its customers, independent of the outcome of the ongoing proceeding on the revisions PacifiCorp submitted to its own OATT to allow EDAM participation.<sup>27</sup> The Commission found the EDAM transmission framework it accepted in the

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<sup>26</sup> *Id.* at 9, 37.

<sup>27</sup> See *id.* at 1 (stating "these proposed OATT changes are consistent with or superior to the *pro forma* OATT and will allow PGE to become an EDAM Entity for purposes of market participation"); *id.* at 8 (stating "despite general alignment [with PacifiCorp's OATT revision filing], PGE's filing contains certain provisions unique to PGE and stands on its own as just and reasonable and consistent with or superior to the *pro forma* OATT"); *id.* at 9 ("PGE's EDAM implementation is just and reasonable and consistent with or superior to the *pro forma* OATT.") (some capitalization changed to lower-case type); *id.* at 29 ("Notwithstanding PGE's general alignment with PacifiCorp's approach to EDAM implementation, PGE's filing stands on its own and should be evaluated as just and reasonable and not unduly discriminatory or preferential on its own merits and as applied to the specific needs of PGE and its customers.").



DAME-EDAM Order is consistent with or superior to the *pro forma* OATT.<sup>28</sup> As the Commission recognized, EDAM builds on the WEIM and is an extension of the CAISO's well-established day-ahead market. The Commission should similarly accept the PGE OATT Filing as consistent with or superior to the *pro forma* OATT. The PGE OATT Filing represents the next step in this evolution and expansion of the West-wide markets and will allow PGE and its customers to realize significant benefits.<sup>29</sup>

The CAISO coordinated with and supported PGE in its stakeholder process that resulted in the PGE OATT revisions.<sup>30</sup> The CAISO's engagement in the PGE stakeholder process reaffirms its support for the continued evolution of EDAM following implementation. This commitment extends to all interested EDAM participants and stakeholders with the understanding that EDAM, as established by the CAISO Tariff and as proposed in PGE's OATT revisions, represents a starting point. EDAM will necessarily evolve over time as the CAISO, participants, and stakeholders gain operational experience with the initial design and consider how to enhance the design to further the overarching objective of developing and establishing a well-functioning market consistent with sound design principles for the benefit of all customers. To this end, the CAISO

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<sup>28</sup> DAME-EDAM Order at P 307.

<sup>29</sup> See *supra* section II of this Answer (discussing benefits of voluntary participation in those markets as identified in the DAME-EDAM Order and the analysis in the PGE OATT Filing).

<sup>30</sup> See transmittal letter for PGE OATT Filing at 9.

will engage with stakeholders at all levels to evolve the market design in the same spirit of collective collaboration it has demonstrated to date.<sup>31</sup>

The CAISO has compared the final version of PGE's OATT revisions with the relevant provisions in the CAISO Tariff—specifically, with various CAISO Tariff provisions that require an EDAM entity and EDAM transmission service provider to include provisions addressing specified matters in their tariff(s). In this regard, Exhibit No. PGE-004 to the PGE OATT Filing contains a comparison chart demonstrating how PGE's OATT revisions implement the specified CAISO Tariff provisions. The CAISO has reviewed both this comparison chart and the full PGE filing and agrees the PGE OATT revisions fulfill the applicable requirements for EDAM participation contained in the CAISO Tariff.

As PGE explains, one component of its OATT revisions is the two-step methodology it proposes for sub-allocating collected EDAM congestion revenues, which is the same as the two-step methodology PacifiCorp proposed in the proceeding on PacifiCorp's OATT revisions to allow EDAM participation.<sup>32</sup> The CAISO has confirmed this two-step methodology aligns with the CAISO Tariff requirements for EDAM participation and is implementable by the CAISO in a timely manner as part of the EDAM design, including the Draft Final Proposal published in the recently commenced expedited stakeholder process concerning

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<sup>31</sup> Specifically, the CAISO initiated the expedited effort described in its March 7 CAISO Answer on PacifiCorp OATT Revisions. See the materials regarding EDAM congestion revenue allocation posted in March and April 2025 on the CAISO website at <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Extended-day-ahead-market>.

<sup>32</sup> See *id.* at 6, 15-21.

the CAISO's congestion revenue allocation methodology for EDAM.<sup>33</sup> For reasons the CAISO has previously explained to the Commission, this two-step methodology is just and reasonable.<sup>34</sup>

PGE accurately notes the CAISO recently “commenced an expedited stakeholder process to evaluate whether and how to revise the overall EDAM market design to allocate congestion settlements that are in other EDAM footprints (including the CAISO BAA [balancing area])—that is, congestion settlement costs *other than* those already allocated to the EDAM Entity for further suballocation.”<sup>35</sup> The CAISO agrees with PGE that the “CAISO's expedited stakeholder process raises an issue entirely outside the scope of this proceeding because PGE has no ability to allocate revenues it does not receive,” and the “CAISO's outreach pertains specifically to its tariff and is distinct from PGE's proposal addressing previously allocated congestion amounts.”<sup>36</sup> Consequently, “[t]he justness and reasonableness of PGE's proposal remains a separate consideration.”<sup>37</sup>

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<sup>33</sup> See Draft Final Proposal – EDAM Congestion Revenue Allocation (Apr. 16, 2025) (proposing to modify the allocation of EDAM congestion revenue and provide parallel flow congestion revenues associated with the exercise of long-term firm and monthly firm Point-to-Point (PTP) and Network Integration Transmission Service (NITS) rights based on submitted day-ahead balanced source and sink self-schedules to the balancing area where the revenue accrues), available at <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Extended-day-ahead-market>. This proposal modified an approach suggested in the Issue Paper published on March 17, 2025 in the same stakeholder proceeding, and will continue to evolve based on stakeholder input and other considerations.

<sup>34</sup> See March 7 CAISO Answer on PacifiCorp OATT Revisions at 4-5, 48-51, 99.

<sup>35</sup> Transmittal letter for PGE OATT Filing at 20 (emphasis in original).

<sup>36</sup> *Id.* at 20, 21.

<sup>37</sup> *Id.* at 21.

PGE commits to delaying its EDAM participation until the CAISO's review of the issue under discussion in the expedited stakeholder process is complete.<sup>38</sup> However, there is no reason for the Commission to postpone a decision on the PGE OATT Filing while the expedited stakeholder process is underway, because PGE's sub-allocation proposal is equally workable with the existing EDAM congestion revenue allocation methodology under the CAISO Tariff and with the recently proposed modification to the current methodology that the CAISO might adopt in the expedited stakeholder process to adjust its allocation of EDAM congestion revenue to PGE.<sup>39</sup> The CAISO will, in any event, coordinate with PGE through the implementation process according to the Commission's directives.

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<sup>38</sup> *Id.* at 2. The CAISO notes this stakeholder process is well underway and is anticipated to produce a substantive recommendation in May resulting in a CAISO filing with the Commission soon thereafter. To date, the CAISO has published an Issue Paper on EDAM congestion revenue allocation on March 17, 2025, held a stakeholder workshop on the Issue Paper on March 24, 2025, received written stakeholder comments on the Issue Paper and workshop on April 7, 2025, and published a Draft Final Proposal on April 16, 2025. In addition, the meeting of the CAISO Market Surveillance Committee (MSC) held on March 28, 2025 included discussion on EDAM congestion revenue allocation and the Western Energy Markets (WEM) Governing Body was briefed by its market expert, Susan Pope, concerning this issue in its public meeting held on April 8, 2025. The MSC will discuss this issue further at its meeting noticed for May 2, 2025. The CAISO plans to present its final proposal for EDAM congestion revenue allocation for approval by the CAISO Governing Board and the WEM Governing Body at their joint meeting scheduled for May 21, 2025.

<sup>39</sup> See March 7 CAISO Answer on PacifiCorp OATT Revisions at 99.

#### **IV. Correspondence**

In accordance with Rule 203(b)(3) to the Commission's Rules of Practice and Procedure,<sup>40</sup> the CAISO respectfully requests that all correspondence and other communications regarding this filing be directed to the following:

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<sup>40</sup> 18 C.F.R. § 385.203(b)(3).

## V. Conclusion

For the foregoing reasons, the CAISO requests that the Commission accept the PGE OATT Filing, without modification or condition.

Respectfully submitted,

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Dated: May 1, 2025

## **CERTIFICATE OF SERVICE**

I certify that I have served the foregoing document upon the parties listed on the official service list in the above-captioned proceeding, 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 Washington, DC this 1<sup>st</sup> day of May, 2025.

/s/ Deiman Flores

Deiman Flores

Davis Wright Tremaine LLP