



October 23, 2025

California Independent System Operator Corporation Board of Governors
250 Outcropping Way
Folsom, CA 95630

Re: CAISO's Resource Adequacy Modeling and Program Design (RAMPD) Track 3A Initiative

Dear Members of the CAISO Board of Governors,

On behalf of Middle River Power (MRP), I am writing to express our concerns regarding CAISO's Resource Adequacy Modeling and Program Design (RAMPD) Track 3A proposal, specifically as they relate to proposed data submittal requirements within the CAISO's Capacity Procurement Mechanism (CPM) process.

MRP supports CAISO's goal to ensure a robust CPM backstop process to maintain system reliability. We recognize and appreciate CAISO's efforts to enhance the CPM backstop process and to engage with stakeholders.

We respectfully disagree, however, with the CAISO's approach outlined in the Track 3A proposal. The proposal requires market participants to submit additional data regarding non-Resource Adequacy monthly to the CAISO. This proposed requirement creates significant additional work for market participants without demonstrable benefit to the CPM process.

CAISO has indicated that the purpose of this proposal is to better account for capacity not being offered to the CPM Competitive Solicitation Process (CSP). While MRP understands this intent, we believe that the lack of CSP offers stems from factors other than just the CAISO's lack of visibility into non-RA capacity, including constrained capacity supply. Implementing only the proposed data submittal measures now without fully understanding and addressing all the dynamics that may be contributing to the lack of CSP offers, as intended for Track 3B, is premature.

We also question the need to collect non-RA capacity data monthly for a backstop process that has been used infrequently. Before summer 2025, CAISO solicited non-RA capacity data from market participants to prepare for the possibility of issuing CPM designations during the summer. During the August 2025 RAMPD initiative meeting, when asked about how this data was used, the CAISO did not provide any details with regards to how the data was used or how it helped the CAISO understand why capacity was not offered into the CPM CSP. From this exchange it is unclear to MRP what

additional, currently unrealized benefit the CAISO would realize from such monthly data.

Conversely, MRP supports CAISO receiving monthly data on non-RA exports. Non-RA export capacity is bilaterally contracted between buyers and sellers and is therefore easy to identify. Unlike non-RA export capacity, however, non-RA capacity does not fall easily into the categories CAISO is now proposing to request monthly in Track 3A due to the hourly granularity of reasons for which the capacity has not been sold and the monthly granularity of CAISO's request.

Finally, MRP does not support CAISO's proposal to eliminate the monthly non-RA capacity report. The non-RA hourly data helps inform market participants how much non-RA capacity is being relied upon to maintain reliability. CAISO's proposal to eliminate this granular report and replace it with an aggregated report would reduce transparency.

MRP therefore respectfully requests that the Board direct CAISO to require market participants submit non-RA capacity data to the CAISO only twice per year, specifically, in the RA year-ahead time frame (October) and prior to the summer. MRP proposed this refinement in our comments in the initiative, but the CAISO did not adopt it. MRP also respectfully requests that the Board direct the CAISO to retain the granular monthly non-RA capacity report. We also recommend that the need for this information, along with the frequency with which it is collected, be revisited during the comprehensive evaluation of the CPM process in Track 3B.

We appreciate the Board's attention to these concerns and respectfully urge you to consider our recommendations as you consider the RAMPD Track 3A proposal. MRP remains committed to working collaboratively with CAISO and other stakeholders to maintain reliability and achieve efficient market outcomes.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Theaker", with a long horizontal flourish extending to the right.

Brian Theaker
VP Western Regulatory and Market Affairs
Middle River Power LLC
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San Diego, California 92121