October 26, 2026

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation
Docket No. ER15-2565-___
September 2026 Informational Report
Energy Imbalance Market – Transition Period Report – Power Watch, LLC

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its report on the transition period of Power Watch, LLC during its first six months of participation in the Western Energy Imbalance Market (WEIM) for September 1 - September 30, 2026. The Commission also directed the Department of Market Monitoring (DMM) to submit an independent assessment of the CAISO's report, which the CAISO's DMM will seek to file within approximately 15 business days.

Please contact the undersigned with any questions.

Respectfully submitted

By: *<u>/s/ John Anders</u>*

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Western Energy Imbalance Market

September 1 - September 30, 2026

Transition Period Report

Power Watch (GWA) WEIM Entity

October 26, 2026

I. Introduction and Background

On October 29, 2015, the Federal Energy Regulatory Commission (Commission) approved the California Independent System Operator Corporation's (CAISO) proposed tariff amendments to allow a transition period for new Western Energy Imbalance Market (WEIM) entities during the first six months of WEIM participation, effective November 1, 2015.[1] Power Watch (GWA), the prospective WEIM Entity entered the WEIM on May 6, 2026, and the transition period will apply to the GWA balancing authority area (BAA) until October 31, 2026.[2]

During the six-month transition period, the price of energy in the new WEIM entity's BAA is not subject to the pricing parameters that normally apply when the market optimization relaxes a transmission constraint or the power balance constraint. Instead, during the six-month transition period, the CAISO will clear the market based on the marginal economic energy bid (referred to herein as "transition period pricing"). In addition, during the six-month transition period, the CAISO sets the flexible ramping constraint relaxation parameter for the new WEIM entity's BAA between $0 and $0.01, but only when the power balance or transmission constraints are relaxed in the relevant WEIM BAA. This is necessary to allow the market software to determine the marginal energy bid price.

Consistent with the Commission's October 29 Order, the CAISO and the Department of Market Monitoring (DMM) will file informational reports at 30-day intervals during the six-month transition period for any new WEIM entity. The CAISO provides this report for GWA to comply with the Commission's requirements in the October 29 Order. The CAISO anticipates filing these reports on a monthly basis. However, because the complete set of data is not available immediately at the end of the applicable month,[3] and depending on the market performance each month, along with the need to coordinate with the WEIM entity, the CAISO expects to continue to file the monthly reports approximately 25 days after the end of each month in order to provide the prior full month's data.

[1] *California Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,104 (2015) (October 29 Order).
[2] This follows from the application of CAISO Tariff section 27(b)(1), which refers to a number of months rather than a number of days.
[3] The earliest the CAISO can start gathering the data is 10 business days after the last day for the reporting month since this is when the price correction window expires.

II. Highlights

Overall, GWA's transition into the WEIM was smooth and without significant issues. The market performance highlights for September are as follows:

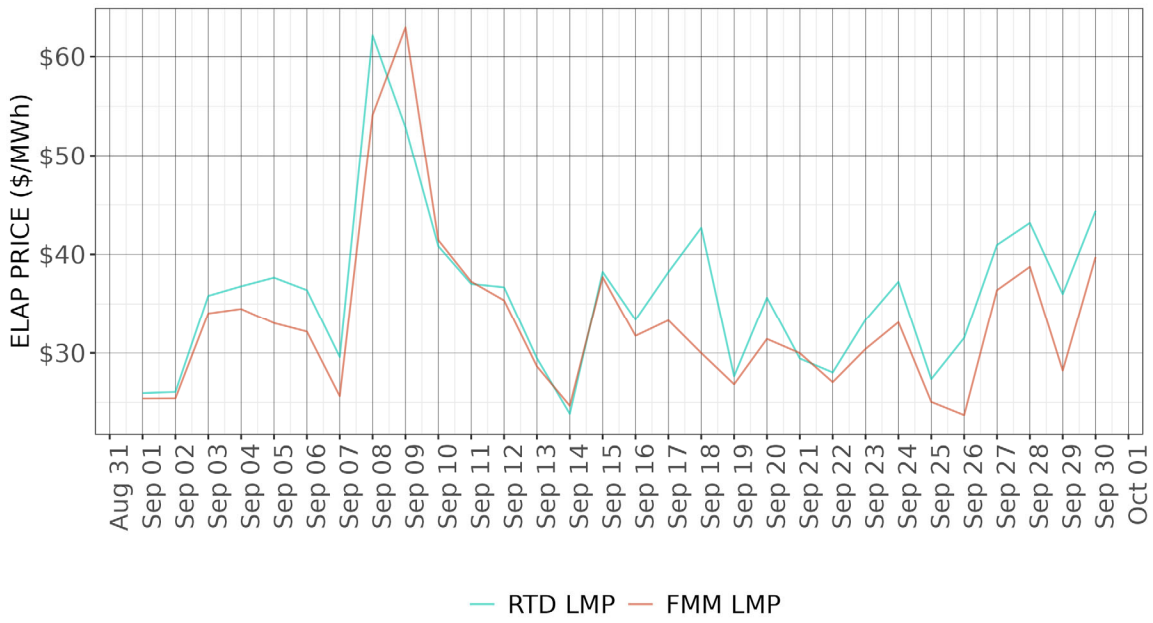
- Prices were stable and within reasonable ranges for GWA BAA, with a monthly average price of $33.27/MWh in the fifteen-minute market (FMM) and $35.95/MWh in the five-minute real-time dispatch (RTD).
- GWA BAA observed 62 infeasibilities for undersupply in the fifteen-minute market and 235 instances in the five-minute market.
- As part of the resource sufficiency test performed for each WEIM entity prior to the real-time markets, GWA successfully passed over 99.3 percent of its balancing tests and 99.93 percent of its bid-range capacity tests.
- As part of the resource sufficiency test, GWA passed successfully 91.05 percent of its upward flexible ramping sufficiency tests.
- The price for upward flexible ramping capacity in the FMM for the GWA BAA averaged at $1.85/MWh, while prices for the downward flexible ramping product averaged $0.09/MWh.

III. Market Performance Related to the Transitional Period

a. Prices

Figure 1 shows the daily average Fifteen-Minute Market (FMM) and Real-Time Dispatch (RTD) prices in the GWA WEIM Load Aggregation Point (ELAP) for September 01, 2026 to September 30, 2026. September's monthly average price in the FMM was $33.27/MWh and $35.95/MWh in the RTD.

Figure 1: Daily average prices for the GWA BAA



Under the CAISO's price correction authority in Section 35 of the CAISO tariff, the CAISO may correct prices posted on its Open Access Same-Time Information System (OASIS) if it finds: (1) that the prices were the product of an invalid market solution; (2) the market solution produced an invalid price due to data input failures, hardware or software failures; or (3) a result that is inconsistent with the CAISO tariff. The prices presented in Figure 1 include all prices produced by the CAISO consistent with its tariff requirements. That is, the trends represent: (1) prices as produced in the market that the CAISO deemed valid; (2) prices that the CAISO could, and did, correct pursuant to Section 35 of the CAISO tariff; and (3) any prices the CAISO adjusted pursuant to the transition period pricing reflected in Section 29.27 of the CAISO tariff.

b. Frequency of Power Balance Constraint Infeasibilities

Figures 2 and 3 show the frequency of intervals in which the power balance constraint was relaxed for under-supply conditions in the GWA BAA for the FMM and RTD, respectively. The under-supply infeasibilities are classified into three categories: Valid, Corrected and Would-Be-Corrected. Those under-supply infeasibilities, which are impacted by either data input failures or software failures where the ISO performed price correction pursuant to Section 35 of the CAISO tariff, are classified as Corrected. There are other under-supply infeasibilities that were impacted by data input failures or software failures; and which would be subject to price correction, but were not corrected because the price after correction would be the same price as that obtained by the transition period pricing. These instances are classified as Would-Be-Corrected. All remaining under-supply infeasibilities, which were driven by system conditions, are classified as Valid.

Figure 2: Frequency of FMM under-supply infeasibilities in the GWA BAA

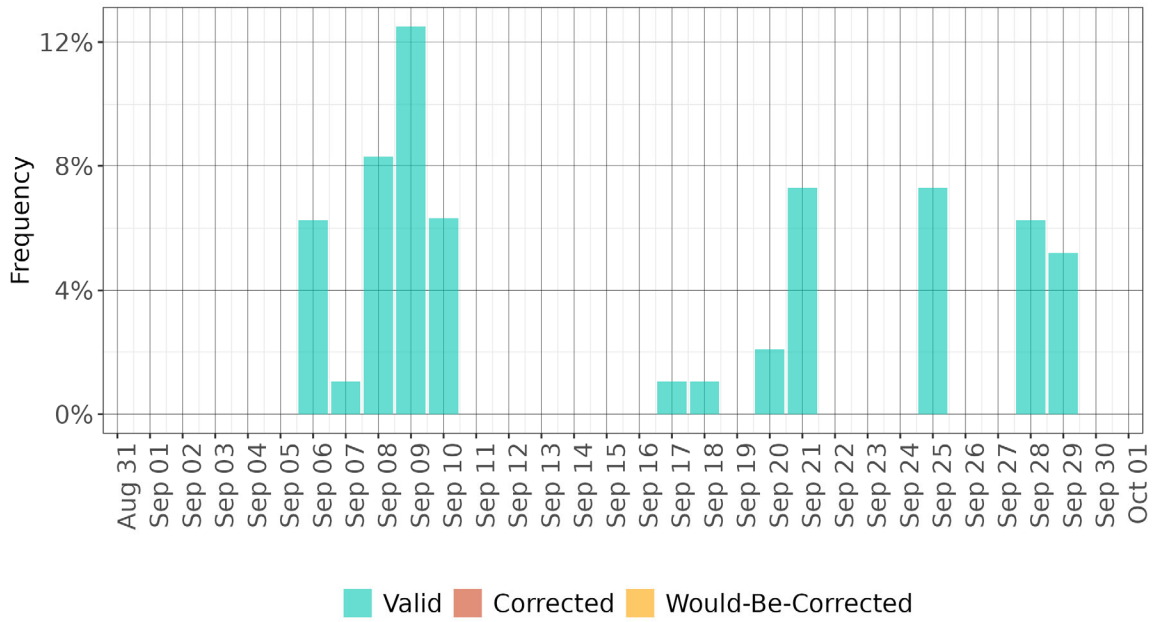
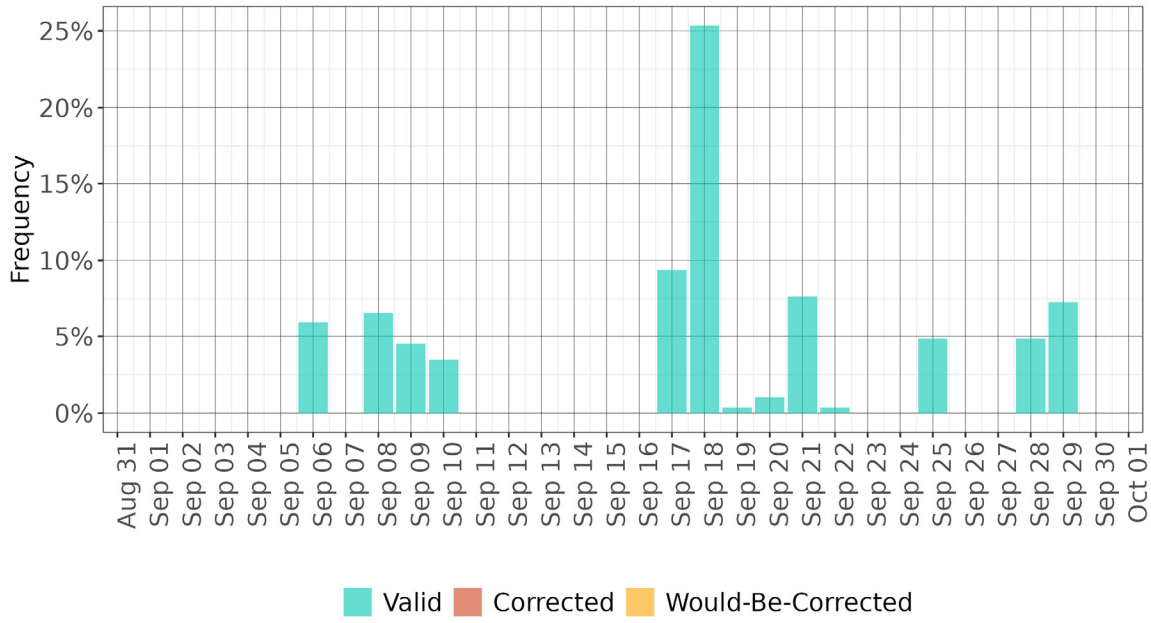


Figure 3: Frequency of RTD under-supply infeasibilities in the GWA BAA



Tables 1 and 2 list the valid FMM and RTD intervals with infeasibilities observed in September. When an entry lists more than one interval, the MW listed is the summation of all intervals included.

Table 1: List of valid FMM under-supply infeasibilities in the GWA BAA

Trade Date	Trade Hour	Trade Interval	MW Infeasibility
9/6/2026	18	1–4	69.01
9/6/2026	19	1–2	12.43
9/7/2026	1	4	18.78
9/8/2026	12	4	61.33
9/8/2026	13	1–4	458.29
9/8/2026	17	4	31.48
9/8/2026	18	4	17.13
9/8/2026	19	4	103.42
9/9/2026	1	4	83.34
9/9/2026	2	1–2	163.37
9/9/2026	19	1–2, 4	127.08
9/9/2026	20	1, 4	67.33
9/9/2026	21	4	4.81
9/9/2026	22	1–2, 4	27.91
9/10/2026	18	1–4	189.63
9/10/2026	19	1, 4	117.29
9/17/2026	18	1	1.29
9/18/2026	23	4	39.95

9/20/2026	19	2, 4	43.62
9/21/2026	9	4	98.92
9/21/2026	10	1–4	250.85
9/21/2026	11	1–2	26.71
9/25/2026	19	1–2, 4	228.31
9/25/2026	20	1–4	264
9/28/2026	19	3–4	230.17
9/28/2026	20	1–4	229.75
9/29/2026	4	4	1.34
9/29/2026	10	1–4	70.29

Table 2: List of valid RTD under-supply infeasibilities in the GWA BAA

Trade Date	Trade Hour	Trade Interval	MW Infeasibility
9/6/2026	18	2–6	24.27
9/6/2026	20	1–12	382.41
9/8/2026	12	1–2, 5–10	583.8
9/8/2026	13	2–6	143.13
9/8/2026	18	5, 12	71.19
9/8/2026	19	1, 7–8	181.74
9/8/2026	20	7	21.58
9/9/2026	1	1, 4–5	35.95
9/9/2026	19	1–3	50.4
9/9/2026	20	10	11.24
9/9/2026	21	6, 8–12	66.91
9/10/2026	17	12	4.1
9/10/2026	18	6–12	80.93
9/10/2026	19	10–11	27.62
9/17/2026	21	6–12	382.89
9/17/2026	22	1, 8, 10–12	45.48
9/17/2026	23	5–9, 11–12	90.94
9/17/2026	24	5–12	81.31
9/18/2026	1	5–7, 9, 11–12	50.14
9/18/2026	2	5–8, 12	50.27
9/18/2026	3	5–9, 12	63.45
9/18/2026	4	5–10	299.3
9/18/2026	5	6–12	59.36
9/18/2026	6	10–12	102.28
9/18/2026	7	1, 11–12	27.99
9/18/2026	8	5–12	100.07
9/18/2026	9	6–12	121.67

9/18/2026	10	1, 5–12	84.91
9/18/2026	11	5–12	138.24
9/18/2026	12	5–6	9.2
9/18/2026	23	8–9	42.12
9/18/2026	24	9	8.95
9/19/2026	22	1	2.96
9/20/2026	1	2	25.11
9/20/2026	19	2–3	12.45
9/21/2026	9	5–12	702.72
9/21/2026	10	1–12	947.01
9/21/2026	11	9–10	64.88
9/22/2026	17	4	55.65
9/25/2026	19	1–3, 5–12	463.44
9/25/2026	20	5–7	67.62
9/28/2026	18	12	37.97
9/28/2026	19	2–12	698.55
9/28/2026	20	1, 5	70.01
9/29/2026	2	5–7	65.84
9/29/2026	8	11	22.29
9/29/2026	9	6–11	140.33
9/29/2026	10	1–11	549.22

In general, under-supply infeasibilities for a BAA could be driven by multiple contributing factors. A root cause analysis was performed for all valid FMM and RTD under-supply infeasibilities listed in Tables 1 and 2. One main reason was identified for each of these infeasibilities. Figures 4 and 5 show the daily count of valid RTD and FMM under-supply infeasibilities categorized into various reasons. The reasons identified for under-supply infeasibilities are generation outage or manual dispatches, resource deviation, RTD load bias, EIM transfer limits, suboptimal solution and market disruption.

The under-supply infeasibilities driven by generation outage or manual dispatch refers to those intervals where there was sudden loss of generation due to a complete resource outage or a manual dispatch limiting generator output.

The under-supply infeasibilities driven by resource deviation refers to those intervals where FMM forecasts for wind generation were lower than submitted base schedules, or where wind generation that was primarily dispatched through a persistence forecast based on telemetered output in the five-minute market was generating less than fifteen-minute forecasts of generation.

The under-supply infeasibilities driven by RTD load bias refers to those RTD intervals where the market requirement saw non-zero values due to a load bias

set by the BAA, and the load bias MW value is greater than the infeasibility MW value.

The under-supply infeasibilities driven by EIM transfer limits refer to those intervals where GWA set the allowable import transfer into the balancing area to a zero or very low limit value, which results in lower supply allowed to come into the area to help meet the demand needs.

The under-supply infeasibilities driven by a suboptimal solution refer to these intervals when occasionally, a suboptimal solution can occur given the time allowed to find a solution and the existing parameters for solving a very large-scale mixed integer optimization problem.

The under-supply infeasibilities driven by market disruptions refer to those intervals impacted by a market isolation event requested by Power Watch.

Figure 4: Count of FMM under-supply infeasibilities categorized by reasons

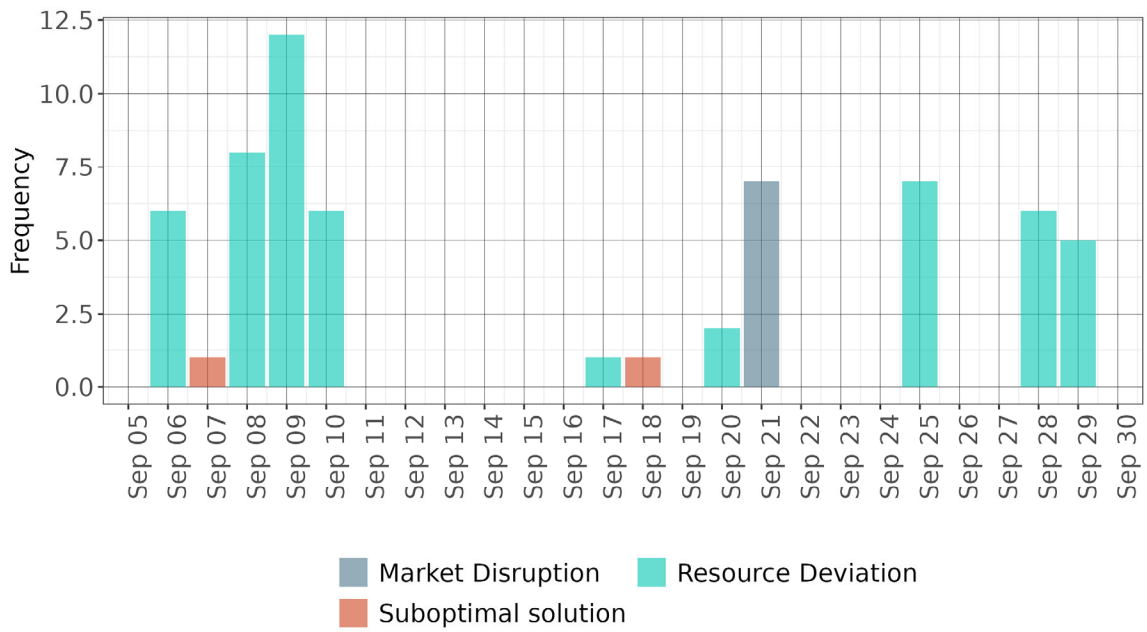
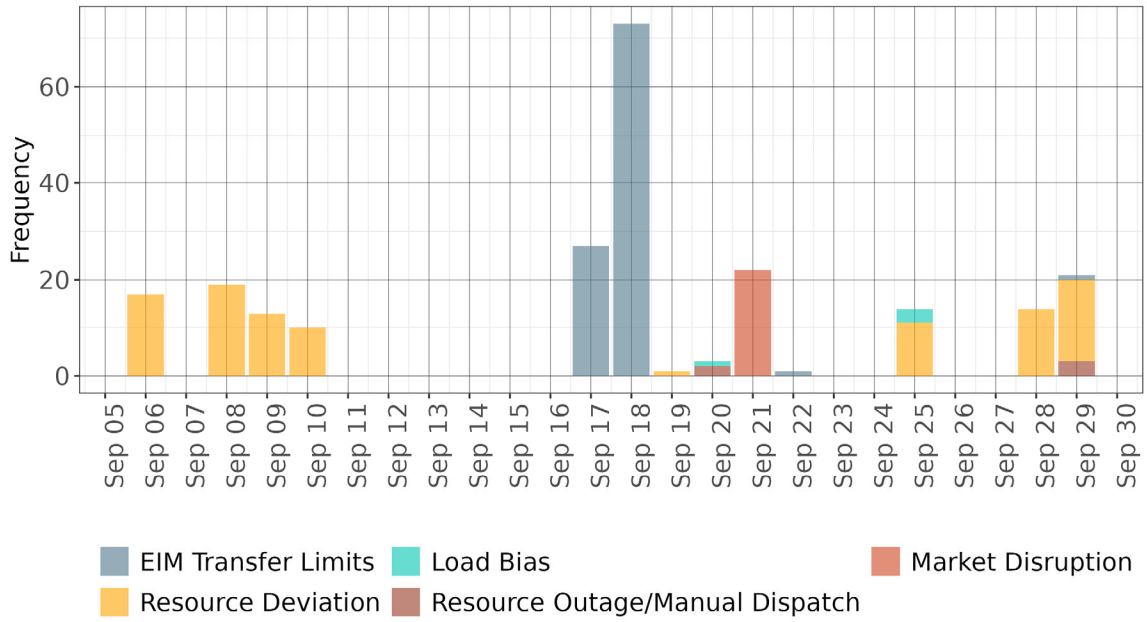


Figure 5: Count of RTD under-supply infeasibilities categorized by reasons



c. Balancing and Sufficiency Test Failures

The WEIM provides an opportunity for various BAAs to serve their load while realizing the benefits of increased resource diversity. Since the WEIM does not include resource adequacy requirements or obligations for resources to submit bids, the CAISO performs a series of resource sufficiency tests comprised of: (i) a balancing test; (ii) a capacity test; and (iii) a flexible ramping sufficiency test. These tests occur prior to the real-time market. Performance of a balancing test before each trading hour ensures that each participating BAA submits a balanced base schedule of generation and a net schedule interchange to meet its demand. In addition, the participating BAA is required to submit bids with enough ramping capability to meet its net load forecast uncertainty and net load movement requirements. Figure 6 shows the trend of balancing test outcomes for the period of September 01, 2026, through September 30, 2026, and Figure 7 shows the pattern of bid-range capacity test outcomes for the same period.[4] If a balancing test or the bid-range capacity test is affected by data input failures or a software failures, those test results are shown as correctable events. The GWA BAA passed the balancing test in 99.3 percent of the intervals in September, which is within the acceptable range of balancing test failures. The reasons for

[4] The CAISO performs resource sufficiency tests pursuant to Section 29.34(k) of the CAISO tariff.

balancing test failures include mismatches between GWA's generation and NSI (Net Schedule Interchange) base schedules submitted, and generator outages.

The GWA BAA passed the bid-range capacity test in 99.93 percent of intervals. The bid-range capacity test failures were driven by the balancing test failures which set the requirement for the bid range capacity test, and insufficient upward or downward capacity available among participating resources.

Figure 6: Frequency of Balancing test failures in the GWA BAA

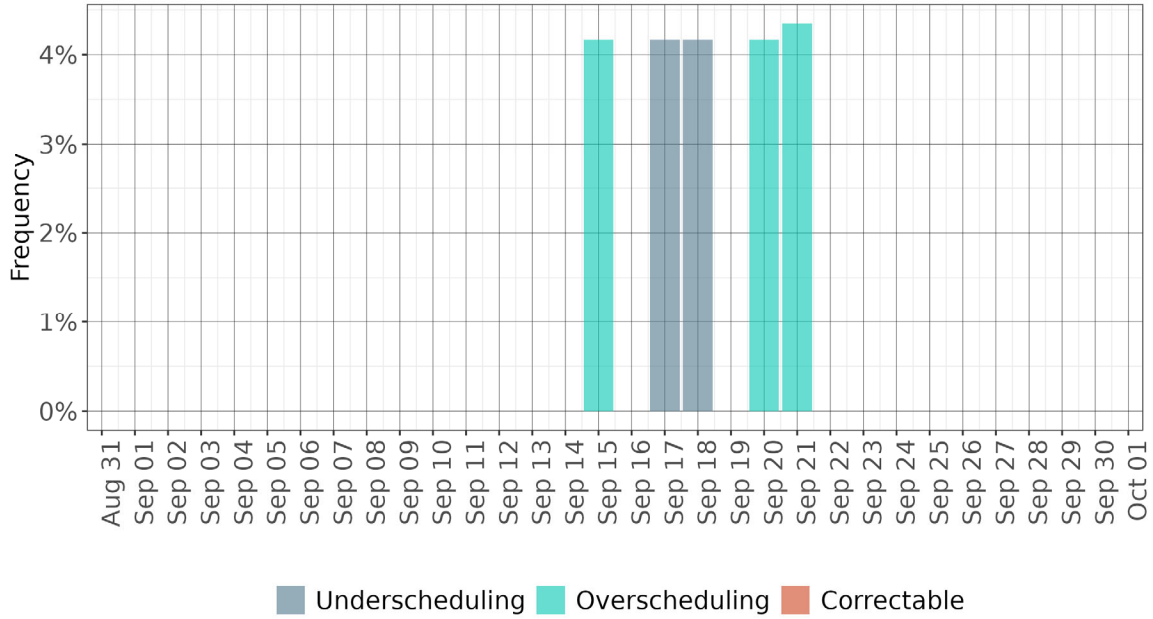
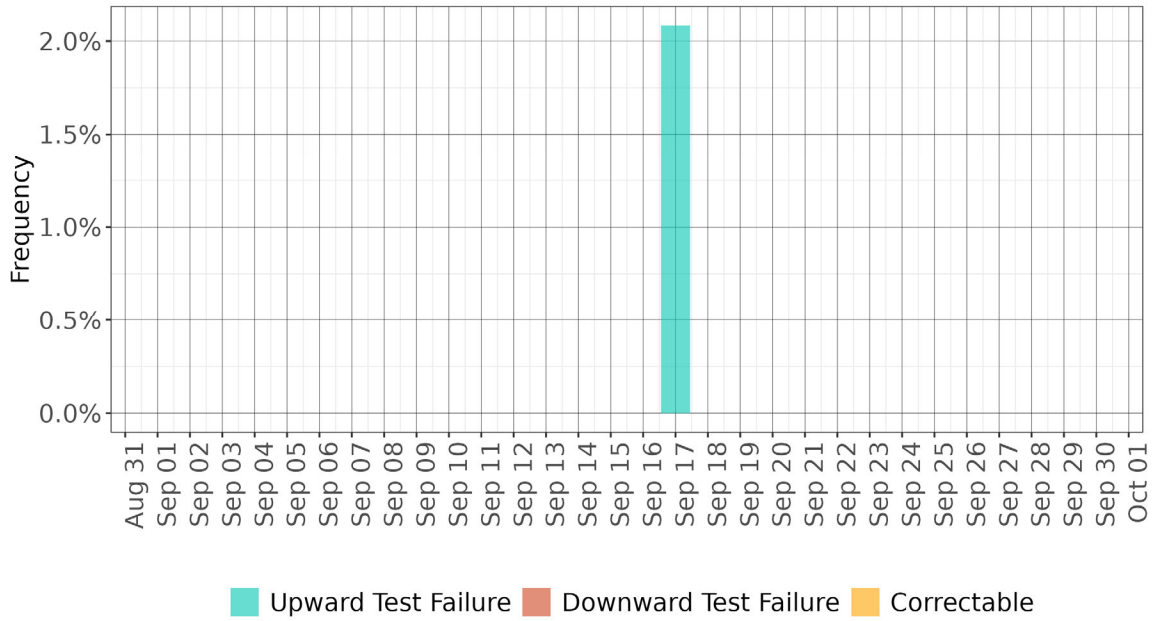
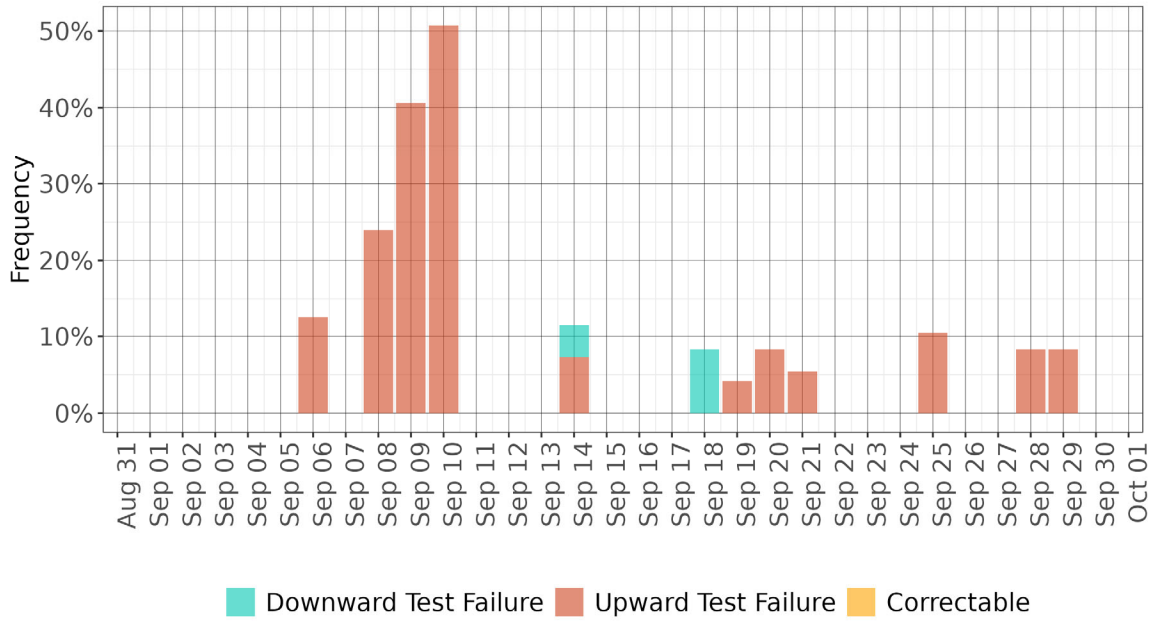


Figure 7: Frequency of Bid Range Capacity test failures in the GWA BAA



The CAISO also performs the flexible ramping sufficiency test as specified in Section 29.34(m) of the CAISO tariff. Figure 8 shows the trend of the test failures for flexible ramping for the period of September 01, 2026 through September 30, 2026. The GWA BAA passed the flexible ramp up and down tests in 90.65 percent of the intervals in September. Flexible ramping sufficiency test failures were driven by low wind output, changes to submitted NSI tag values that resulted in negative contribution towards flexible ramp capacity, resource outages and battery SOC limitations.

Figure 8: Frequency of Flexible Ramping Sufficiency test failures in the GWA BAA



d. Flexible Ramping Product

Figure 9 shows the daily average of the upward and downward flexible ramping constraint requirement and procurement in the FMM for the GWA BAA. Figure 8 shows the daily average of the upward and downward flexible ramping constraint prices in the FMM for the GWA BAA.

The implementation of the flexible ramping product refinements on February 1, 2023, included changes to the requirement calculation, procurement, and pricing for the flexible ramping product. As part of these refinements, each BAA only needs to procure its own flexible ramping requirement when it fails the flexible ramping test or the bid range capacity test. If the BAA fails the test in the upward direction, it will need to procure its own flexible ramping up requirement, and if it fails the test in the downward direction it needs to procure its own flexible ramping down requirement. When the BAA passes the test, it is pooled with all other entities that pass, and the requirement and procurement of flexible ramping

are determined at the pass group level. There are thresholds in place to ensure no single entity procures an outsized share of the pass group flexible ramping requirements. Both the BAA and pass group requirements are set based on historical forecast deviations for load, wind, and solar.

For each interval, a demand curve is created based on the historical cost of the uncertainty, and both the BAA and the pass group can use both the demand curve and their resources to procure their requirement at least cost. This is the main reason why the individual GWA procurement may fall below the individual GWA flex ramp requirement. The requirement shown in Figure 9 below only includes intervals in which GWA failed one of the resource sufficiency tests and had to procure their own flexible ramping product, it does not include the requirements when they were part of the pass group. If a BAA fails the flexible ramping test or the bid range capacity test at T-55 minutes prior to the start of the next trading hour, the BAA will have its own FRP requirement and financially binding resource flexible ramping product awards and prices in the first 15-minute interval of the trading hour in FMM as the associated FMM process is executed after the tests at T-55.

Figure 9: Daily average requirement and procurement of upward and downward flexible ramping in FMM

The price trend provided in Figure 10 is the FMM flexible ramping product price applicable to the GWA BAA in each interval averaged over each day. When the BAA passes the flexible ramping sufficiency test and the bid range capacity test, the price will be set by the pass group flexible ramping shadow price. When the BAA fails either test, the price is set by the individual GWA BAA flexible ramping shadow price. In September, the average upward flexible ramping capacity price was $1.85/MWh and the average downward flexible ramping capacity price was $0.09/MWh. The highest daily average FMM flexible ramping capacity price was observed on September 9th, where multiple FMM intervals saw $247 upward flexible ramping capacity prices. These FMM intervals failed the upward flex ramp sufficiency test resulting in additional flexible ramping capability being procured from a surplus demand curve, which set the $247 price. The individual BAA or pass group flexible ramping pricing can drop below zero due to the inclusion of congestion in the flexible ramping product price formation as part of the flexible ramping product refinements.

Figure 10: Daily average price for upward and downward flexible ramping in FMM

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced 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 Folsom, California, this 26th day of October 2026.

/s/ Ariana Rebancos

Ariana Rebancos