



Stakeholder Comments Template

Congestion Revenue Rights (CRR) Modeling and Settlement in the Extended Day-Ahead Market (EDAM) Stakeholder Meeting (June 12, 2025)

This template has been created for submission of stakeholder comments on Congestion Revenue Rights (CRR) Modeling and Settlement in the Extended Day-Ahead Market (EDAM) Stakeholder Meeting, which took place on June 12, 2025. The meeting presentations have been posted to the miscellaneous stakeholder meetings [webpage](#) and the Congestion Revenue Rights [page](#). The meeting recording will also be posted in both these locations.

Upon completion of this template, please submit it to ISOStakeholderAffairs@caiso.com. Submissions are requested by close of business on **July 3, 2025**.

Submitted by	Organization	Date Submitted
Alan Meck	Pacific Gas & Electric	7-3-25

Please provide your organization's comments on the following issues and questions.

PG&E appreciates CAISO being responsive to the concerns raised by stakeholders in the EDAM Congestion Revenue Allocation comments. PG&E offers the following comments on the Congestion Revenue Rights (CRR) Modeling and CRR Settlement in EDAM meeting held on June 12th:

- CRR Modeling Enhancements: PG&E supports CAISO's proposed enhancement to account for parallel flows in allocating CRRs.
- CRR Settlement in EDAM: PG&E is concerned about an item in CAISO's presentation.

1. Please provide your feedback on CRR modeling considerations supporting EDAM launch as described in the "Briefing on CRR Implementation for EDAM" presentation.

PG&E supports CAISO's proposed enhancement to account for parallel flows in allocating CRRs. CAISO proposes to begin modeling parallel flows in the Simultaneous Feasibility Test (SFT) such that it more accurately reflects the actual flows. This is a sensible enhancement for CRRs that should improve the accuracy of the SFT.

2. Please provide your feedback on the settlement of CRRs (CRR1B) in EDAM as described in the “CRR Settlement in the Extended Day Ahead Market” presentation.

PG&E is concerned about an item in CAISO’s presentation where it reads: “For EDAM BAA constraints, the CRR offset amount shall equal to zero.”¹ PG&E would like CAISO to clarify some questions. First, is this a change that CAISO is proposing, or is this part of the currently approved EDAM tariff and CAISO is trying to clarify how it intends to implement it? Second, does this mean that CAISO is not planning to apply the CRR1B solution to parallel flows from EDAM BAAs on CAISO’s system? By CRR1B, PG&E is referring to the clawback rule whereby CAISO calculates the congestion paid to CRR holders in excess of congestion rents collected from Integrated Forward Market (IFM) flows and then charges the excess congestion rent back to CRR holders on a pro rata basis. This was a critical improvement made to CRRs that helped solve some of the CRR underfunding problem. If CAISO is not planning to apply the CRR1B solution to EDAM BAs’ parallel flows, then PG&E is concerned that this could cause negative impacts on CRRs.

3. Please provide any additional feedback regarding the Congestion Revenue Rights (CRR) Modeling and Settlement in the Extended Day-Ahead Market (EDAM) stakeholder workshop discussion on June 12, 2025.

No additional comments.

¹ CRR Settlement in Extended Day Ahead Market, slide 7, found here:
<https://www.caiso.com/documents/presentation-congestion-revenue-rights-modeling-in-extended-day-ahead-market-jun-12-2025.pdf>