



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

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

No comment.

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.

SDG&E appreciates the opportunity to comment on the CRR Modeling and Settlement in the EDAM Stakeholder Meeting. CAISO appears to be applying a different treatment than what was approved in the 2019 CRR1B initiative to non-CA EDAM entities. SDG&E understands that this proposal could result in adverse impacts for California entities and urges CAISO to model the magnitude of revenue clawback on CRRs resulting from this proposal. SDG&E believes it would be helpful to have analysis to better understand the CRR revenue impact of the CAISO's proposal to set the CRR Offset Amount equal to zero for EDAM BAA constraints. While SDG&E understands CAISO does not expect there will be revenue shortfalls from this proposal due to expected revenue from imbalance reserves, energy schedules and unbalanced OATT schedules, CAISO has not provided analysis to support this claim. If a revenue shortfall does materialize SDG&E is concerned that increased underfunding will increase costs for CA load. Additionally, we

request CAISO provide more information on how netting (daily/monthly) will be applied to EDAM CRA payments.

The WEM Governing Body Market Expert and the MSC expressed similar concerns, stating the proposed rules could result in a decline in the value California loads receive from holding CRRs or from the CRR auctions because there is asymmetric treatment that creates a priority for non-CA firm OATT schedules that are feasible because of counterflow. Additionally, if non-CA EDAM entities could potentially see significant savings from increased self-scheduling, they could see internal or local pressure to increase frequency of self-scheduling so that those additional savings are passed on to the non-CA EDAM entities. Any modeling and analysis the CAISO can do to measure these potential impacts before EDAM market simulation would be helpful to understand the magnitude of this proposal and whether it presents a significant issue.

If CAISO's analysis shows the impacts to CA load create an inequitable and undue costs shift due to asymmetric treatment of parallel flows and increases the underfunding issue with CRRs, the CAISO should work toward a solution that does not disproportionately impact CA load or contribute to CRR underfunding.

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 comment.