

Summer Market Performance Report September 2024

October 31, 2024

Prepared by Market Performance and Advanced Analytics

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Acronyms

AET	Assistance Energy Transfer
BAA	Balancing Authority Area
BANC	Balancing Authority of Northern California
ISO	California Independent System Operator
CCA	Community Choice Aggregator
CEC	California Energy Commission
CPUC	California Public Utilities Commission
DAM	Day ahead market
DALPT	Day-ahead low priority exports
DLAP	Default Load Aggregated Point
ED	Exceptional Dispatch
ELCC	Effective Load Carrying Capacity
ESP	Energy Service Provider
ETC	Existing Transmission Contract
FMM	Fifteen Minute Market
HASP	Hour Ahead Scheduling Process
HE	Hour Ending
IFM	Integrated Forward Market
IOU	Investor-Owned Utility
LMP	Locational Marginal Price
LMPM	Local Market Power Mitigation
LPT	Low priority export. This is a scheduling priority assigned to price- taker exports that do not have a non-RA supporting resource
LSE	Load Serving Entity
LRA	Local Regulatory Authority
MW	Megawatt
MWh	Megawatt-hour
NGR	Non-Generating Resource
NOB	Nevada-Oregon Border
NSI	Net Scheduled Interchange
OASIS	Open Access Same-Time Information System

OR	Operating Reserves
PDR	Proxy Demand Response Resource
PRM	Planning Reserve Margin
PST	Pacific Standard Time
ΡΤΟ	Participating Transmission Owner
РТК	High priority assigned to a schedule. Exports are assigned this priority when they can have a non-RA resource supporting its export.
PV	Palo Verde
QC	Qualifying Capacity
RA	Resource Adequacy
RDRR	Reliability Demand Response Resource
RTD	Real-time Dispatch
RTM	Real-Time Market
RTLPT	Real-time low priority export
RUC	Residual Unit Commitment
SMEC	System Marginal Energy Component
SOC	State of Charge
TOR	Transmission Ownership Right
WECC	Western Electricity Coordinating Council
WEIM	Western Energy Imbalance Market

1 Executive Summary

The California Independent System Operator (ISO) regularly reports on market performance to provide timely and relevant information. This report is part of a series of monthly reports focusing on the ISO's market performance and system conditions during summer months, June through September. These months are of interest because it is when system conditions are often constrained in California and the Western Interconnection. These monthly reports also provide a performance assessment of specific market enhancements implemented as part of the ISO's ongoing effort to ensure readiness for summer conditions.¹

The major highlights for the month are:

The instantaneous peak load for the ISO area occurred on September 5 at 48,353 MW. This was the peak for the year when California and the West experienced a heatwave in the beginning of September and was significantly lower than the all-time system peak demand of 52,061 MW on September 6, 2022. ISO supply was more than sufficient to meet forecast demand in September.

Average peak ISO loads in September 2024 were moderate at 35,062 MW, which was higher than the average daily peak loads in September 2023 of 31,949 MW. The peak load in September of 48,353 MW was higher than the California Energy Commission's (CEC) month-ahead forecast of 47,160 MW.

Monthly resource adequacy capacity was 53,403 MW, more than enough to meet load, inclusive of demand, operating reserves, and supply and demand uncertainties. This is higher than the 52,920 MW of resource adequacy capacity for September 2023. Compared to September 2023, RA capacity for storage resources increased by 2,951 MW while static imports increased by 613 MW. Hydro and gas resources saw a decrease of 206 MW and 3,593 MW, respectively.

The ISO's average prices in September were \$38/MWh and \$33/MWh for the integrated forward and real-time dispatch (RTD) markets, respectively, down from \$40/MWh and \$33/MWh in August. The daily prices saw a decreasing trend through September reaching maximum levels from September 4 to September8, with similar trends observed for prices in other regions of the Western Energy Imbalance Market (WEIM). Bilateral prices at the Mid-C and Palo Verde hubs trended higher than ISO day-ahead prices with averages of about \$61/MWh and \$47/MWh, respectively.

There was sufficient supply to meet the adjusted California ISO load forecast in peak hours in the residual unit commitment (RUC) process for all days in September. There were economic and low-priority export reductions in the RUC during September 4-9 to balance supply with demand. The export reduction was up to 3,724 MW on September 5 in RUC and up to 465 MW on September 28 in Hour – Ahead Scheduling Process (HASP) market.

¹ This report is targeted in providing timely information regarding the ISO's market's performance for the month of September. Several metrics provided in this report are preliminary and based on data still subject to change. It is also important to note that the data and analysis in this report are provided for informational purposes only and should not be considered or relied on as market advice or guidance on market participation.

Capacity offered to the ISO market by storage resources continues to increase. In September 2024, there were 172 batteries registered in the ISO markets. The bid-in capacity for energy was consistently over 8,000 MW in September. The maximum state of charge in real time was about 31,934 MWh, and real-time dispatches reached a maximum of 7,439 MW. This capacity helped to meet peak conditions. Storage resources continued to supply a significant portion of regulation capacity.

The hourly average of net imports was 4,736 MW for peak hours 17 through 21 in September. The ISO market was able to accommodate and clear over 7,900 MW of exports on September 5 as high demand conditions persisted in the broader West. The larger volume of exports generally occurred prior to the peak hours when solar production was plentiful and prices were moderate.

WEIM transfers were predominantly exports from the ISO balancing authority area (BAA) during midday hours. However WEIM transfers were importing into the ISO BAA during the heat wave event from September 4 – 7. Overall, WEIM transfers reflect the economic and operational benefits that WEIM offers to participating entities by maximizing supply diversity and transferring supply from where it is available to where it is needed in real-time.

About 99 percent of the resource adequacy imports to the ISO bid at \$0/MWh or lower in the day-ahead and real-time markets. This assessment is for static imports related to load-serving entities under the jurisdiction of the California Public Utilities Commission (CPUC).

Up to 475 MW of the 510 MW of registered high-priority wheel-through transactions for the month of **September participated in the day-ahead market**. This represents a 93 percent utilization of the registered wheels. For low priority wheels, the maximum transaction was 275 MW from the Palo Verde to Mirage locations. All high-priority wheels were honored in the markets in September.

Reliability demand response resources were dispatched at a maximum of 195 MW in the real-time market on September 5 after they were economically bid and cleared in the day-ahead market. The largest volume of dispatches for proxy demand response resources in the day-ahead timeframe occurred on September 5 at 191 MW, whereas in the real-time market, there was a maximum of 154 MW for the same trade date. There were no emergency events to trigger dispatch of reliability demand response resources.

On average, the ISO's daily average market costs were \$28.65 million in September, representing an average daily cost of \$42.27/MWh, slightly lower than \$43.79/MWh in August. The highest daily cost accrued September 5 at about \$108 million. These higher costs are expected in summer conditions with higher demand levels settled at higher energy prices.

2 Background

In mid-August 2020, a historical heat wave affected the western United States resulting in energy supply shortages that required two brief and limited rotating power outages in the ISO balancing authority area (BAA) on August 14 and 15, 2020. The heat wave extended through August 19. The ISO declared emergencies for August 17 and 18 but avoided rotating outages. Over the 2020 Labor Day weekend, California experienced another heat wave and again the ISO avoided rotating outages.

Following the publication of the Final Joint Root Cause Analysis, the ISO initiated an effort to identify, discuss with market participants, and propose enhancements across different areas of the market practices. This effort was initiated with educational workshops to level the understanding of existing market practices and their implications. This was followed by the formal launch of the Market Enhancements for the summer 2021 Readiness initiative².

For summer 2024, the following enhancements continue to be in place:

- 1. Import market incentives during tight system conditions
- 2. Real-time scarcity pricing enhancements
- 3. Reliability demand response dispatch and real-time price impacts
- 4. Transmission service and market scheduling priorities

The minimum state of charge constraint was active only through the summer 2023, and is no longer in place for summer 2024. As part of the energy storage enhancements, new functionality was implemented for storage resources through exceptional dispatches for better management of state of charge during tight system conditions.

As part of the ISO's effort to assess market performance, the summer performance reports are published for the months of June through September.

² The policy initiative material can be found at <u>https://stakeholdercenter.caiso.com/StakeholderInitiatives/Market-enhancements-for-summer-2021-readiness</u>

3 Demand and Supply Conditions

Resource adequacy

The ISO manages the resource adequacy (RA) program established by the CPUC for its jurisdictional load serving entities (LSEs), which include Investor Owned Utilities (IOUs), Community Choice Aggregators (CCAs) and Energy Service Providers (ESPs). Collectively, these LSEs cover about 90 percent of ISO's load. The ISO also manages the RA program for several other Local Regulatory Authorities (LRAs) in the ISO's footprint. The RA program ensures through contractual obligations that there is sufficient supply capacity to meet the system's needs and to operate the grid reliably. The CPUC and respective LRAs set and enforce RA program rules for LSEs within their jurisdictional footprint. This includes setting monthly obligations based on an electric load forecast and planning reserve margin (PRM), and resource counting rules. The California Energy Commission (CEC) estimates the electric load forecast used by the CPUC and other LRAs in respective RA programs. RA capacity from both CPUC and non-CPUC jurisdictional LSEs is shown to the ISO annually and monthly following a process established by the ISO.

Through the RA program, there are three types of capacity: System, Local and Flexible. All three products serve a purpose in ensuring a reliable operation of the system. For system capacity, the RA requirement ensures the contracted capacity is sufficient to cover the 1-in-2-year (average) peak load plus a PRM.³ This PRM is to cover the 6 percent of operating reserves plus a contingent headroom to account for higher-than-expected load forecast and resource outages.

The monthly RA showing for September 2024 was 53,403 MW, which is higher than September 2023's monthly showing of 52,920 MW.⁴ Figure 1 compares the total monthly RA capacity by fuel type in September 2023 and September 2024. In general, total RA capacity increased across fuel types from year to year with some exceptions. For September 2024, RA capacity for storage resources increased by 5,500 MW to about 8,451 MW, and static imports increased by 613 MW. Hydro RA decreased by 206 MW and gas-fired RA decreased by 3,593 MW.

Static RA imports increased from 3,618 MW in September 2023 to 4,231 MW in September 2024.⁵ The composition by intertie varied between years as shown in Figure 2. RA imports through the Malin intertie between Oregon and California increased from 1,320 MW to about 1,412 MW from September 2023 to September 2024, and imports through Nevada-Oregon Border (NOB) intertie increased from 1,027 MW to about 1,279 MW across the same timeframe. Monthly RA capacity tends to increase as the summer

³ The planning reserve margin is 17 percent for the CPUC jurisdictional entities in 2024. Other LRAs may set their own respective PRMs. In Decision 21-12-015, the CPUC established an "effective" PRM for 2022 and 2023 which may be met with both RA and non-RA resources that may not be in the wholesale market. Decision 23-06-029 extended an "effective" PRM of 1,700 to 3,200 MW to 2024 and 2025.

⁴ These values are based on the monthly showings estimates available at the time of preparing this report. These monthly showings are provided through the supply plans to meet the final RA obligation. The final RA obligation is composed of the forecast plus PRM and then all credits, including DR, are deducted. The total RA values can change through the month, with weekend showing typically a significant reduction. For simplicity in the reporting and comparison, the simple average through the month is used as a reference in this report. Also, the total RA values represented in this report include any CPM and RMR capacity.

⁵ Dynamic and pseudo tie resources are grouped into the corresponding fuel type instead of the generic import group. Generic imports are referred as Static imports in this report.

progresses and was generally on par with quantities from 2023. Generally, monthly static RA imports also increase as the summer progresses through the months of August and September. These trends are shown in Figures 3 and Figure 4.

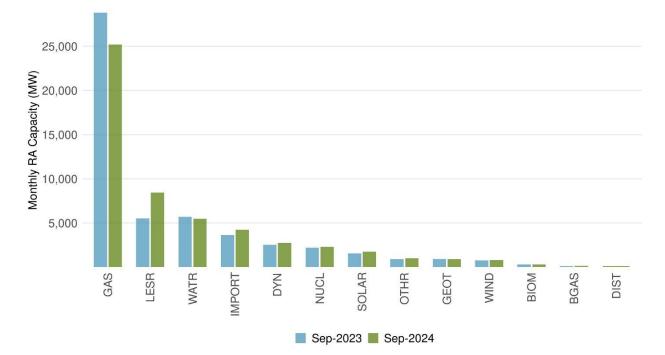
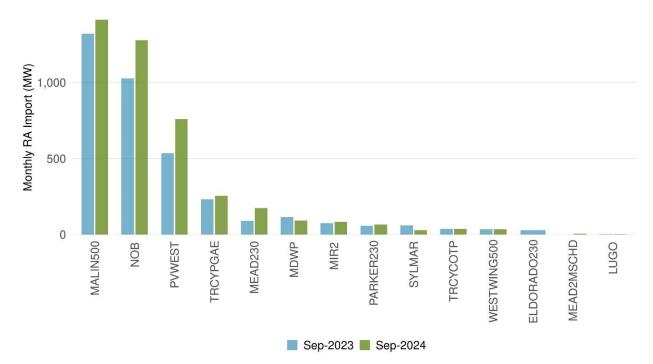


Figure 1: RA capacity organized by fuel type

Figure 2: Monthly RA imports organized by tie



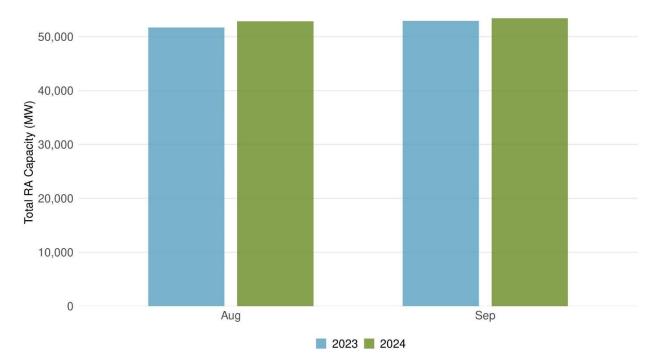
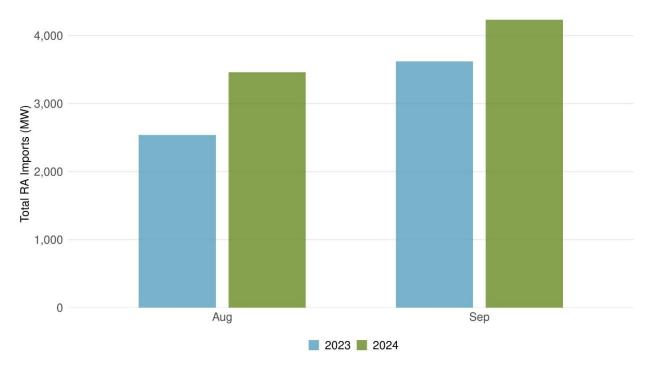


Figure 3: Monthly RA showings



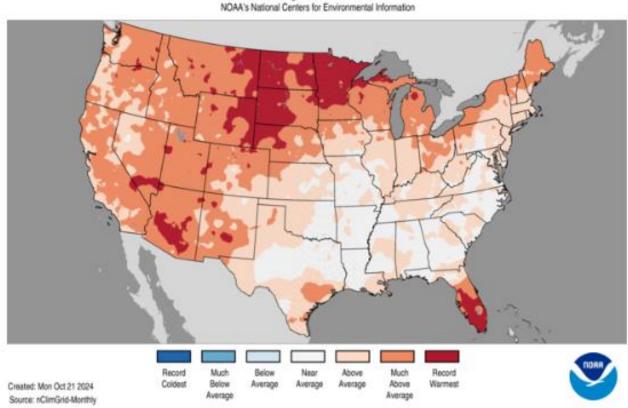


Weather

Above average, much above average, and record warmest mean temperatures were observed across the far western United States throughout September.

California's mean temperature in September⁶ was ranked as the 6th warmest September on record (of 130 years) with much of the state experiencing above average minimum temperatures and much above average maximum temperatures. Arizona and Wyoming had their warmest September on record with regards to the average temperature, and the rest of the western states were in their top 10 warmest.





Ranking Period: 1895-2024 NOAA's National Centers for Environmental Information

September featured two heat events across the west: one in the first week of the month and one in the final week of the month. Which event was stronger varied by location, with California and the Pacific Northwest experiencing the larger heat anomalies at the beginning of the month and the Desert Southwest at the end. This is shown below in Figure 6.

⁶ <u>https://www.ncei.noaa.gov/access/monitoring/us-maps/</u>

		aliforn High tempera		·	· ·		Portland Gas and Electric (PGE) High temperature departure from normal									
			ember				September 2024									
Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Mon	Tues	Wed	Thurs	Fri	Sat			
1 -1	² -0.6	3 5	4 8	₅ 12	6 12	7 8	1 5	2 -10	3 -3	4 12	₅ 20	6 14	7 8			
⁸ 10	9 9	10 -0.5	11 -6	12 -6	13 -4	14 -4	8 5	9 4	10 2	11 -9	12 -8	13 -4	14 - 4			
15 -11	16 -15	17 -12	18 -10	19 -9	20 -9	21 -5	15 -9	¹⁶ 0.8	17 -12	¹⁸ -6	19 -1	20 -3	21 3			
- 0.3	23 5	²⁴ 4	25 -4	26 -1	27 3	28 1	²² 5	23 7	²⁴ 18	25 -3	26 -1	27 1	28 3			
²⁹ 0.6	30 6						29 -3	30 4								
				days < normal 17	days>normal 13	Deg+/- normal					days < normal 14	days>normal 16	Deg+/- norma + 1.2			
		above normal	below normal	Normals: 1990-2020]				above normal	below norma	Normals: 1990-2020]				
		1a Publ ^{gh temperatur}			(PS)		Idaho Power Company (IPCO) High temperature departure from normal									
		Septe	mber 2	2024			September 2024									

Figure 6: Average	temperature	departure	from	normal	for	sample	areas	in the	west
i igui e oi i i ei uge	componenter of control		<i>j. o</i>		,	00111010			

	Ariz	ona Pul	blic Sei	vice (A	ZPS)	Idaho Power Company (IPCO)								
		High tempera	ture departui	e from norma	1	High temperature departure from normal								
		Sept	ember	2024		September 2024								
Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Mon	Tues	Wed	Thurs	Fri	Sat	
1	2	3	4	5	6	7	1	2	3	4	5	6	7	
2	3	3	6	10	6	3	8	8	-2	-0.4	6	10	9	
8	9	10	11	12	13	14	8	9	10	11	12	13	14	
4	6	6	5	6	3	1	9	8	7	-8	-16	-8	0.9	
15	16	17	18	19	20	21	15	16	17	18	19	20	21	
3	-0.9	-8	-5	-3	-4	-10	1	-6	-18	-8	-3	-0.7	-4	
22	23	24	25	26	27	28	22	23	24	25	26	27	28	
-0.8	6	9	12	12	15	19	-1	3	9	16	6	11	18	
29	30						29	30						
15	11						8	-6						
				days < normal	days > normal	Deg+/- normal					days < normal	days > normal	Deg+/- norn	
				7	23	+ 4.4					13	17	+ 1.9	
					1									
		above normal	below norma	Normals: 1990-2020					above norma	l below norma	Normals: 1990-2020			

The average overnight minimum temperatures for September across many Pacific Northwest and Desert Southwest locations were in the top 3 or top 5 warmest values observed.⁷ Average overnight minimum temperature extremes were not observed as widespread across California, but many cities were still in their top 10 hottest September maximum and minimum temperatures. Across the west in September, there were 789 record warm high temperatures and 1,293 record warm low temperatures tied or broken, many of them occurring the first 10 days of the month.⁸ In addition to the daily records, there were also 60 locations that observed their record warmest overnight low temperature for the month of September, reinforcing how abnormally hot the overnight periods were.

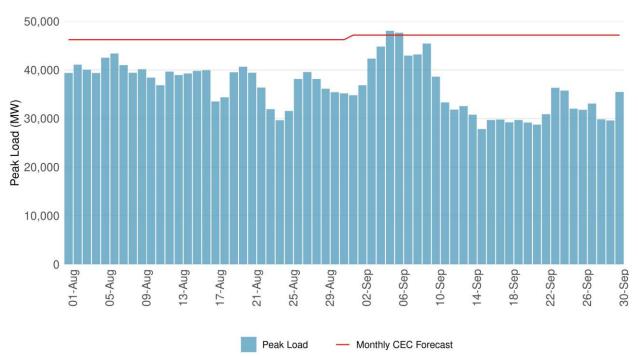
⁷ https://sercc.oasis.unc.edu/Map.php?region=wrcc&

⁸ https://www.ncdc.noaa.gov/cdo-web/datatools/records

The record-breaking heat across the west came on the heels of the hottest summer on record for many locations. The average maximum and minimum temperatures during the three month period of June through August were the hottest observed for many locations, including Phoenix, Las Vegas, and San Jose.

Peak ISO loads

Peak loads in September were elevated from the previous month, exceeding 40,000 MW on several days. The average daily peak load in September 2024 was 35,062 MW which was higher than the average daily peak load from the previous year in September 2023 of 31,949 MW. Figure 7 shows the 5-minute average daily load for August and September relative to the CEC month-ahead forecast used to assess the resource adequacy requirements. The instantaneous load peak in September 2024 was 48,353 MW on September 5. This peak was higher than the CEC month-ahead forecast of 47,160 MW. The below figure is based on the five minute averages of the actual load. The highest five-minute average peak load for the month of September was 48,054 MW.





The actual load did not exceed the monthly RA showings in September 2024 as illustrated in Figure 8. The green line indicates nominal monthly RA showings. As discussed later in this report, the actual capacity made available into the ISO's market (accounting for outages and other factors) varies from day to day. In subsequent sections, the actual RA capacity made available in the market is shown more granularly for the month on an hourly basis.

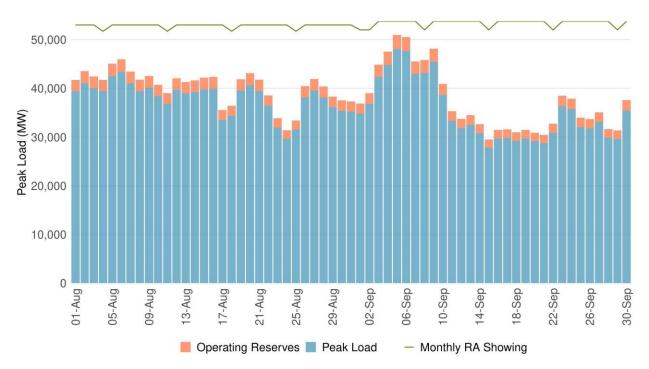


Figure 8: Daily peak load, operating reserves and RA capacity

The instantaneous peak load for the ISO area occurred on September 5 at 48,353 MW. This was the peak for the year and was significantly lower than the all-time system peak demand of 52,061 MW on September 6, 2022. ISO supply was more than sufficient to meet forecast demand in September. The profile of ISO system loads is shown in Figure 9.

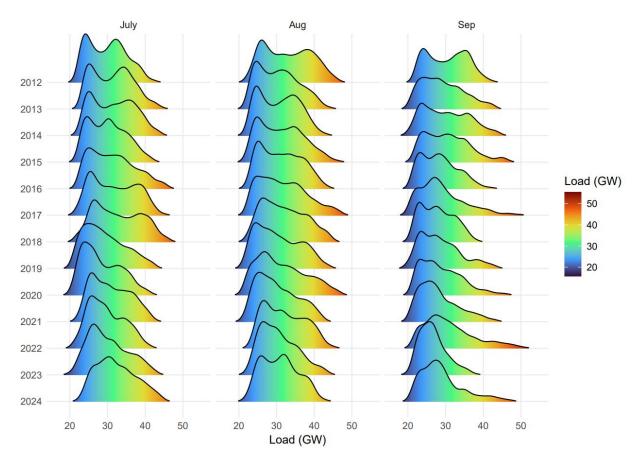


Figure 9: Historical load levels in ISO system in summer months

Market prices

Market prices naturally reflect supply and demand conditions. As the market supply tightens, prices tend to rise. Locational marginal prices in the ISO have three components: the marginal cost of energy on the system, the marginal cost of congestion reflecting constraints, and the marginal cost of losses. With the introduction of the WEIM, the ISO introduced a 4th component, GHG which reflects the marginal cost applied to account for GHG imported into California. The marginal energy component reflects the overall supply and demand conditions. Congestion conditions may also create local or regional price separations.

Figure 10 compares the daily average prices across ISO's markets for the months of August and September.⁹ In comparison with August, the highest daily average peak for Fifteen - Minute Market (FMM) prices was \$61/MWh on September 8 as compared to \$68/MWh on August 1, while the highest daily average day-ahead (IFM) prices was about \$113/MWh on September 5 as compared to \$84/MWh on August 5. The highest daily average Real - Time Dispatch (RTD) market prices reached a maximum of about \$59/MWh on September 8 as compared to \$63/MWh on August 2. Relative to August, the September's maximum price for IFM occurs three days before RTD and FMM instead of three days after RTD and four days after FMM. FMM and RTD prices reached maximum values of \$369/MWh and \$423/MWh on

⁹ Default Load Aggregation Point (DLAP) prices are a good indicator of overall prices. However, congestion may create price separation among DLAPs. The metrics presented here are based on a weighted average price of the DLAPs within the ISO area.

September 8, respectively, while IFM reached a maximum of \$637/MWh on September 5. The IFM prices spiked for September 4 – 6, due to congestion on Midway-Vincent 500 kV line and Norther – Scott 115 kV line during those days.

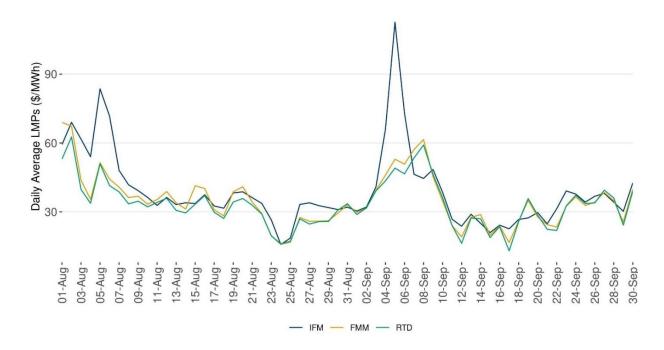


Figure 10: Average daily prices across markets - August and September 2024

Figure 11 and Figure 12 below shows the daily average LMPs for the four regions¹⁰: California, Central/Mountain, Pacific Northwest, and Southwest, in FMM and RTD for the months of August and September. In both months, for real-time dispatch (RTD) and fifteen-minute market (FMM), the California region had the highest daily average LMPs. In September, California peaked on September 2 for RTD and September 1 for FMM at approximately \$64/MWh and \$71/MWh, respectively. In September, California daily average peaked on September 8 at \$56/MWh in FMM and \$54/MWh in RTD, both down from August.

¹⁰ The Pacific Northwest region includes balancing areas such as Bonneville Power Administration, Powerex, Avista Corporation, Avangrid Renewables, Tacoma Power, Seattle City Light, Puget Sound Energy, Portland General Electric Company and PacifiCorp West. Southwest region includes Tucson Electric Power, Public Service Company of New Mexico, Salt River Project, Western Area Power Administration, Arizona Public Service Company, El Paso Electric Company and Nevada Power Company. Central/Mountain region includes Idaho Power Company, NorthWestern Energy and PacifiCorp East. California region includes ISO, Los Angeles Department of Water & Power, Balancing Authority of Northern California and Turlock Irrigation District.

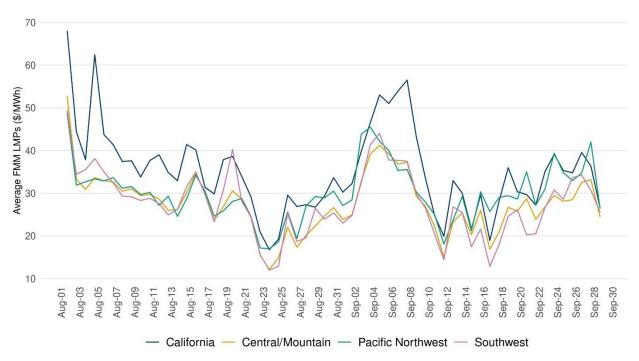


Figure 11: Average daily prices across region for FMM market - August and September 2024

Figure 12: Average daily prices across region for RTD market - August and September 2024

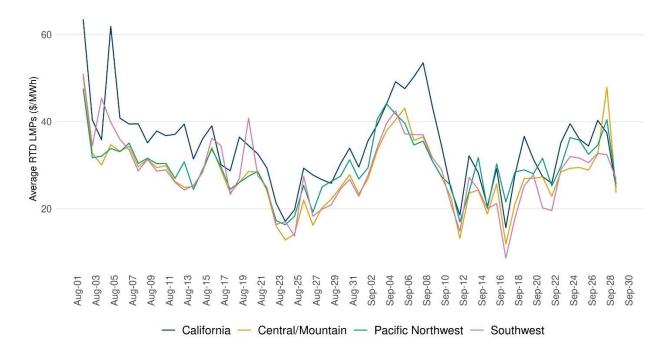


Figure 13 shows the average hourly prices for the month of August and September across the markets. The September hourly average prices for both the RTD and FMM markets peaked in trade hour 19 at \$51/MWh and \$62/MWh, respectively, lower than the integrated forward market prices of about \$87/MWh in trade hour 20.

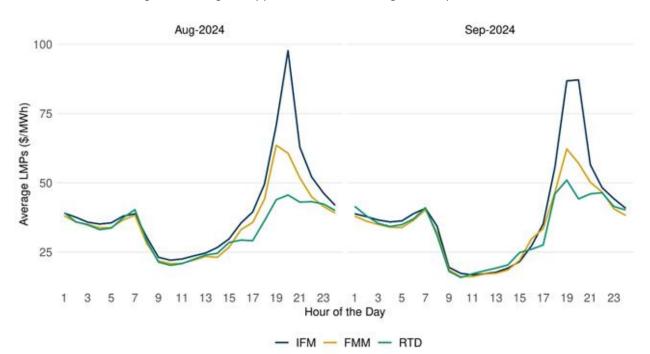


Figure 13: Average hourly prices across markets - August and September 2024

Figure 14: Average hourly prices across markets – for September 4 – 6, 2024

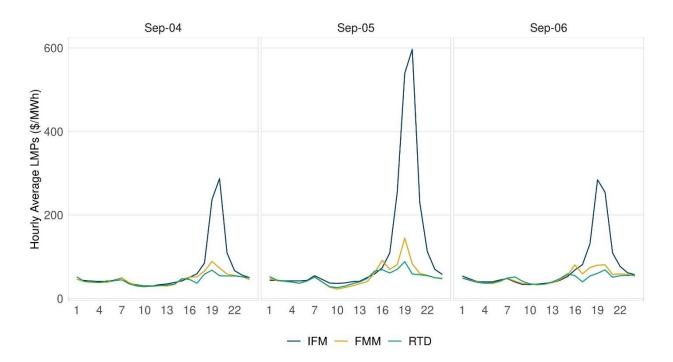
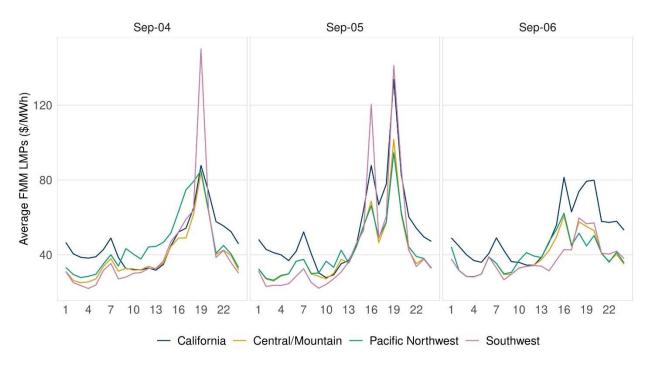


Figure 14 shows the hourly averages across markets IFM, FMM, and RTD for the trade dates September 4 - 6, 2024. The IFM market is the highest peak on all three days, reaching the highest price of \$637/MWh on September 5 for the PGAE LAP, hour 20 with an average of \$597/MWh at that same date and hour.

Figure 15 and Figure 16 depict three-day periods of hourly averages for WEIM Load Aggregation Point (ELAP) prices aggregated by geographical region for FMM and RTD. For FMM, the Southwest region is the highest at \$150/MWh on September 4, hour 19.





For RTD as shown in Figure 16, the Central/Mountain region is the highest at \$350/MWh on September 28, hour 8. For the three day period, Central/Mountain region also peaked at \$151/MWh on September 6, hour 14.

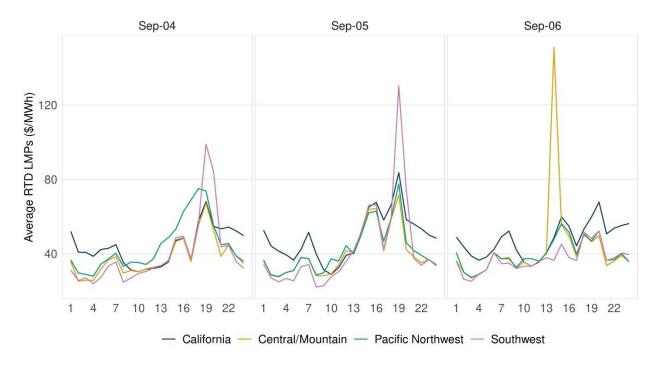


Figure 16: Average hourly prices across region for RTD market - for September 4 – 6, 2024

Index prices

With a considerable share of the ISO's generation fleet consisting of gas resources, gas market and system conditions can have an impact on the electric market. Electricity prices generally track gas prices. Figure 17 shows the average prices (bars in red and blue), and the maximum and minimum prices (whiskers in black), for the two main gas hubs in California, PG&E Citygate and SoCal Citygate. For September 2024, next-day gas prices averaged \$2.52/MMBtu and \$1.97/MMBtu for PG&E Citygate and SoCal Citygate, respectively. The maximum next-day gas prices were \$3.03/MMBtu and \$2.54/MMBtu for PG&E Citygate and SoCal Citygate.

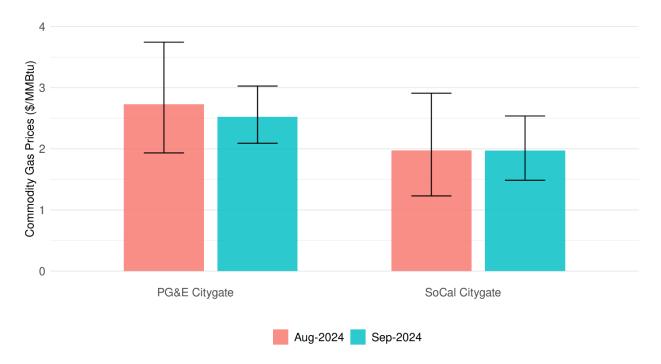


Figure 17: Gas prices at the two main California hubs

Energy trading outside the ISO's footprint on the bilateral power market provides a useful indication of broader price trends and conditions in the West. Prices at hubs like Mid-Columbia (Mid-C) in the north and Palo Verde (PV) in the south may reflect ISO system conditions or vice versa. Power trades bilaterally on both a spot market for physical next-day delivery and on a forward basis for future months.

Next-day power trades in blocks for on-peak and off-peak periods.¹¹ Trading is conducted for next-day delivery and typically concludes prior to 10:00 AM PST. The figures below show a comparison between northern and southern hubs and their corresponding day-ahead LMP for the PG&E DLAP. For the northern region, Figure 18 shows that the Mid-C on-peak bilateral price generally traded similar to the highest hourly day-ahead LMP for the corresponding trading day except for September 4 – 6 when the MIDC bilateral prices were trading lot higher than the IFM DLAP prices. However, due to the block nature of the bilateral power prices, the block price for Mid-C was generally higher than IFM LMPs for hours outside the evening ramp period. The NP15 bilateral price traded more infrequently throughout the month, hence the sporadic availability of data in the trend. Figure 19 for the southern region shows a similar pattern of bilateral on-peak prices at PV and SP15 where SP15 prices were trading similar to the highest than IFM DLAP prices. Because bilateral prices trade in block intervals, Figure 18 and Figure 19 below show similar trends with the corresponding day-ahead LMP averaged over the on-peak block interval. This trend attempts to smooth out the highest peak prices and provide a similar comparison to the block nature of

¹¹ Peak is typically defined as hours-ending 7-22 on weekdays and Saturdays; off-peak is typically defined as hours-ending 1-6 and 23-24 on weekdays and Saturdays, and hours-ending 1-24 on Sundays and holidays.

the bilateral prices. Once averaged, the day-ahead LMPs are generally lower or closer to the corresponding bilateral prices throughout the month.

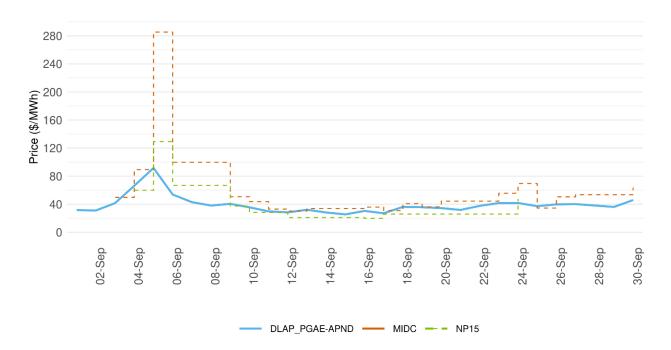


Figure 18: Northern hub prices and PG&E IFM LMP (block average) for on-peak

Figure 19: Southern hub prices and SCE IFM LMP (block average) for on-peak

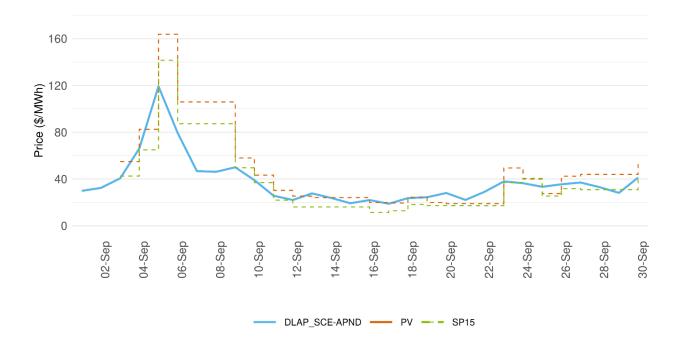


Figure 20 shows a year-to-date trend of on-peak future power prices traded for the 2024 summer months of September, October, and November. Price trends are captured for Mid-C and Palo Verde, as well as the NP15 and SP15 options that trade bilaterally. On-peak future prices have traded dynamically for summer and fall months. Price separation can be observed between the two groups of hubs, with Mid-C and PV generally trading higher than SP15 and NP15 for September MIDC and NP15 are trading higher for October and November.





4 Bid-In Supply

The ISO's markets rely on supply made available from different resources, including internal supply of various technologies and imports. Supply capacity is bid into the market with three components: startup costs, minimum load costs and incremental energy costs. The bid-in capacity is adjusted for any outages and derates on an hourly basis to reflect the actual available supply. That available bid-in capacity is then considered in the market optimization along with the resource's characteristics and system constraints. In addition to supply capacity from RA resources, the market also considers bid-in supply that is above RA level. This supply does not have an RA obligation but economically and voluntarily participates in the ISO's markets. Based on the submitted bids, the market will optimally determine the least-cost dispatch of all resources to meet the bid-in demand in IFM or the load forecast in RUC. It is not unusual for above RA capacity to be dispatched before all the RA capacity is exhausted since resource dispatches are based entirely on prices, resource characteristics and system conditions, and there is no merit order based on whether supply is RA or not.

In the RA program, there are certain qualifiers for a resource's capacity to be eligible to count towards meeting the RA requirements. The CPUC and other LRAs establish Qualifying Capacity (QC) calculations, which are generally based on what a resource can produce during peak load hours. For conventional resources such as gas and hydro, the QC value is based on maximum potential output of the resource. For wind and solar resources, the QC values are based on a statistical methodology known as effective load carrying capability (ELCC). This approach will estimate QC values for wind and solar significantly below their maximum output. Resources are then assessed for deliverability to determine their net qualifying capacity, which is ultimately what is used to determine their RA capacity.

Supply and RA Capacity

Since the summer 2020 events, the ISO has been tracking whether RA capacity available in the ISO's markets is sufficient to meet the needs of both load and operating reserves. To assess this condition, all supply capacity is classified accordingly relative to its monthly RA value. For any wind or solar resource that has any RA capacity assigned in the month, the entire supply available in the market from that resource is considered RA. For any other type of resource such as gas, hydro or imports, RA capacity is determined up to the RA monthly value; any capacity above the RA value is considered above-RA capacity.

Figure 21 shows the breakdown of the day-ahead supply capacity¹² as RA capacity and above-RA capacity. The purple line represents the day-ahead load forecast plus the capacity required to meet operating reserves (OR), which is typically about 6 percent of the load value. The dashed line shows the adjusted load forecast, plus OR, plus high-priority export self-schedules. It represents the overall load obligation to be met in the day-ahead market.

¹² This capacity is assessed based on the supply bid in the market and reflects any outages or derates of resources as long as they are known and recorded before the market is run.

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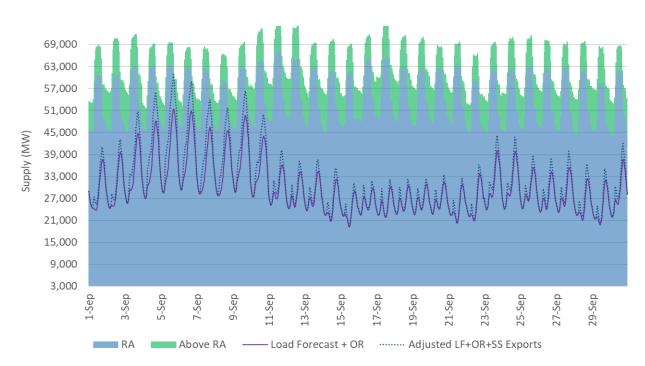


Figure 21: Supply capacity available relative to load forecast in the day-ahead market

Figure 22 shows the same capacity breakdown for September 4-6. In the peak hours of these three days, there was enough capacity to meet the demand although the demand exceeded the RA capacity in some peak hours.

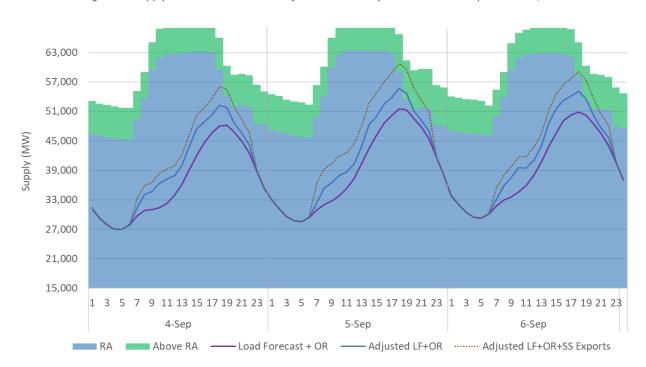
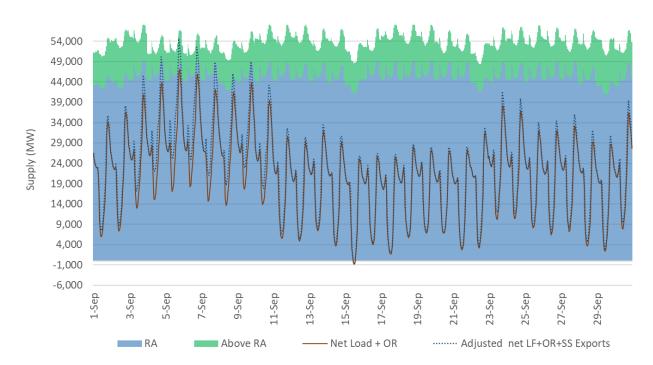


Figure 22: Supply available relative to load forecast in the day-ahead market – September 4-6, 2024

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Figure 23 has similar convention for the same capacity breakdown as Figure 21, but the comparison is relative to the net load (gross load minus VER forecast). Since this figure represents net load, the supply side is also reduced by subtracting all VER contributions. Tracking the available capacity for the net load peak hour is as important as tracking available capacity for the gross peak hour.





For the month of September above-RA capacity was consistently available into the market. The supply available in the market was sufficient to cover the load forecast, and also the load forecast plus the RUC adjustments. For some hours in September, the net-load needs were negative when the VER forecast was high but loads were mild. Figure 24 shows the capacity breakdown from September 4 to 6. In most hours of the three days, RA capacity is sufficient to cover the adjusted net load, operating reserve and self-schedule export. For all three days, RA capacity and above-RA capacity were enough to cover the demand.

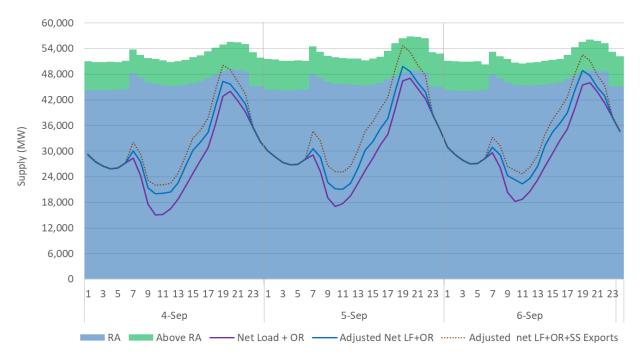


Figure 24: Supply available relative to net load forecast in the day-ahead market – September 4-6, 2024

Unavailable RA capacity

Generating units can face operating conditions that require them to be derated or to be offline. The ISO tracks these outages through the outage system and the outages are reflected in the resource capacity made available in the market. The market considers the outages and derates to impose these limitations on the units, making them unavailable or derating their capacity accordingly. Some outages may be planned while others may be forced. Figure 25 provides the trend of RA capacity on outage organized by fuel type during the month of September. The average daily capacity on outage was about 5,423 MW. Figure 26 shows the RA outage rates for the summer months from June to September by fuel type. It shows that outage rates decreased by over the months from June to September for certain fuel types such as gas – fired resources, energy storage resources.

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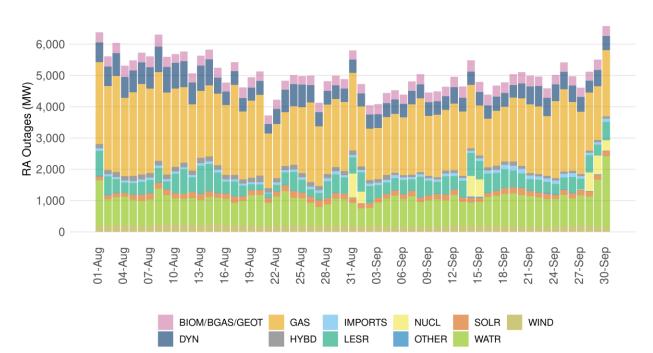
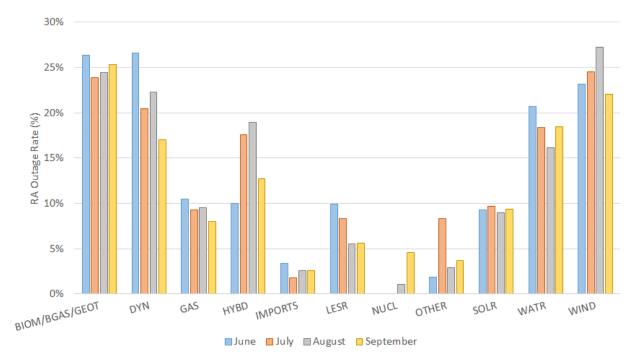


Figure 25: Volume of RA capacity by fuel type on outage in August and September

Figure 26: Comparison of RA Outage Rates by fuel type over the summer 2024



Renewable Production

The ISO's area utilizes hydro production throughout the year to meet demand needs. Figure 27 shows the historical trend of total energy produced from hydro and other renewable resources. Hydro production for 2024 so far has been higher than 2022 but lower than 2023. Hydro production in September 2024 was about 13 percent lower than the production observed in September 2023. With the addition of more solar resources into the system, solar production in September 2024 was 21 percent higher than the production in September 2023. Figure 28 shows the historical trend of solar production. Figure 29 below shows the hourly profile of the average energy produced from hydro resources as well as solar and wind resources for September 2024. Generation from hydro tends to be higher in the morning and evening hours while reaches lower values during midday hours when solar production is plentiful.

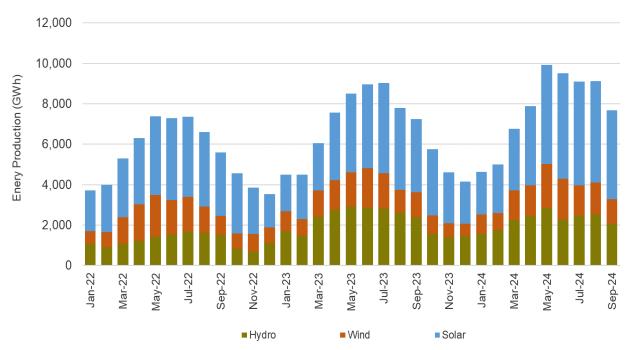


Figure 27: Historical trend of hydro and renewable production

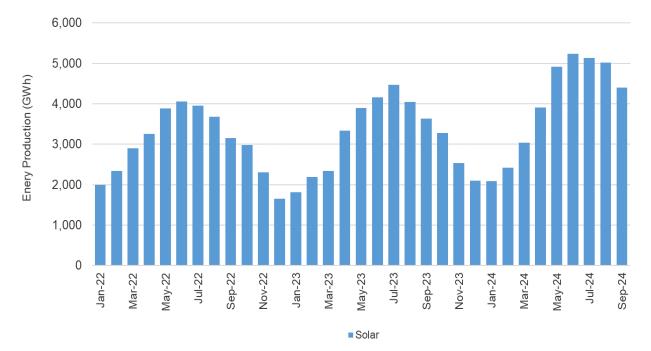


Figure 28: Historical trend of solar production

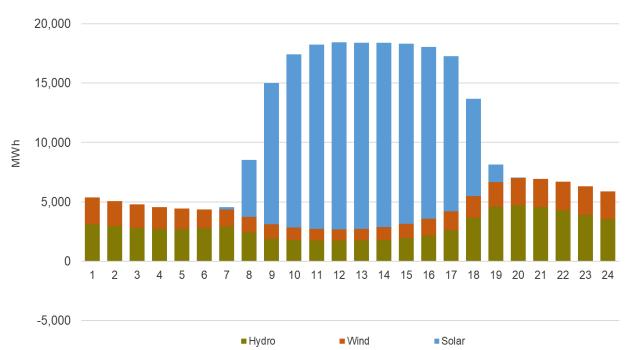


Figure 29: Hourly profile of wind, solar and hydro production for September

Demand and supply cleared in the markets

Figure 30 compares the IFM schedules for physical resources versus the day-ahead load forecast and the adjusted load forecast eventually used in the RUC process. Day-ahead load forecasts tracked the temperature changes observed throughout the month. Day-ahead load forecasts peaked in early September to then reduce significantly for the rest of the month.

The IFM process is the financial market where bid-in demand is cleared against bid-in supply. This IFM clears both physical and convergence bid supply against bid-in demand, convergence bid demand and exports, and produces awards and prices that are financially binding for all resources. Afterwards, the RUC process uses the IFM solution as a starting point to further refine the supply schedules that can meet the day-ahead load forecast. Operators may adjust the day-ahead forecast to factor in other foreseeable conditions such as load and renewable uncertainties. The RUC process will clear supply against the final adjusted load forecast. Since RUC adjustments were used occasionally for morning and peak hours only, the adjusted load forecast used in the RUC process followed similar trend to day-ahead load forecast.

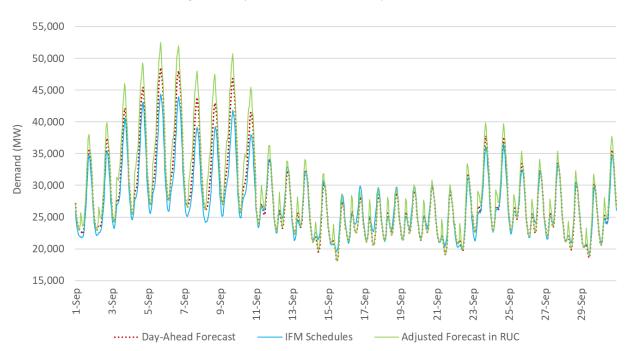


Figure 30: Day-ahead demand trend in September 2024

Figure 31 shows the IFM schedules for physical resources versus the day-ahead load forecast and the adjusted load forecast in the RUC process for September 4-6 during the heat wave. The adjusted forecast in RUC was above the day-ahead load forecast in on-peak hours of the three days.

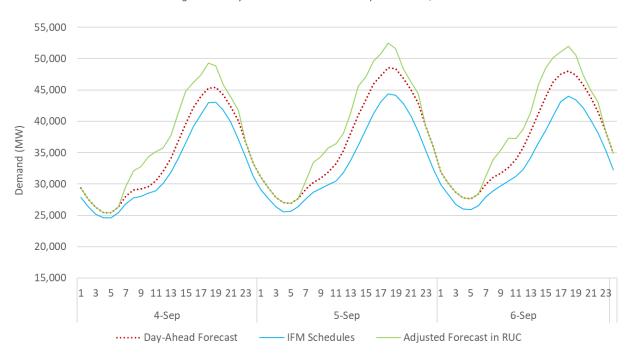
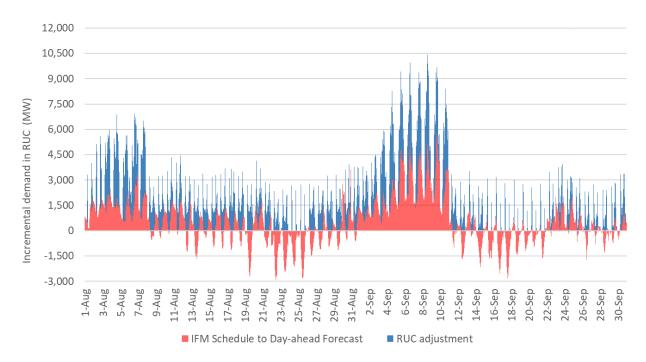


Figure 31: Day-ahead demand trend - September 4-6, 2024

Figure 32 shows the differences between the IFM schedules versus the nominal day-ahead load forecast for RUC. This is the additional capacity relative to the IFM solution that RUC determines is needed to meet the day-ahead load forecast. Effectively, this is either the shortfall or surplus capacity from IFM that RUC has to rebalance. The delta is driven by the difference between cleared bid-in demand and the load forecast, as well as any displacement driven by convergence bids. The area in blue is the RUC adjustment to the day-ahead load forecast. In cases when RUC is infeasible, some of this additional capacity will not be met. RUC adjustment was used more frequently in the beginning of September when the demand was high due to persistent above normal temperatures.





The RUC forecast adjustment is guided by historical uncertainty of load, wind and solar from the dayahead to the real time market. In some cases, there may be other factors to consider by operators to determine the final adjustments. ISO continues to further tune and assess the conditions and the need for RUC adjustments.¹³

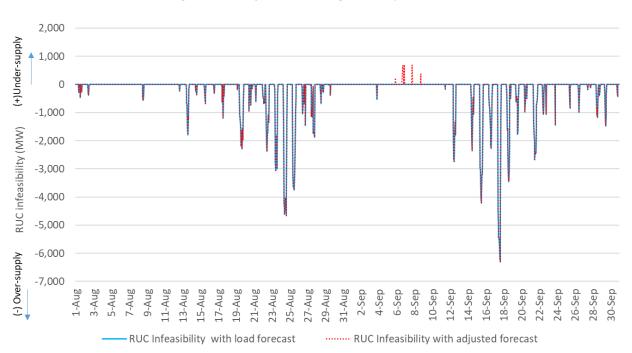
Since RUC clears against a load forecast which is not price sensitive, under certain conditions RUC may relax the power balance constraint due to a surplus or shortfall of supply capacity. A relaxation signals that there is an imbalance between the load requirements and the supply available. An infeasible power balance can be in either direction. In hours with low levels of load and minimum downward capability, RUC may observe an oversupply condition, resulting in a negative infeasibility. Conversely, in hours where there is insufficient supply to meet the load requirement, RUC may have an undersupply condition, resulting in a positive infeasibility. Negative RUC infeasibilities occur because RUC can only dispatch a resource down to its minimum load and cannot actually de-commit a resource or set up additional exports. Conversely, positive RUC infeasibilities occur because all incremental RUC bids have been exhausted and RUC has reduced all possible economic and low priority exports,¹⁴ which leaves just the

¹³ Recent enhancements to the estimation of RUC adjustments can be found in the Market Performance and Market forum meeting material at <u>https://www.caiso.com/meetings-events/topics/market-performance-and-planning-forum</u>

¹⁴ There are different type of exports participation. They can be based on economic bids with prices between the bid floor and the bid cap. They can be price takers, also referred to as low priority exports and labeled as LPT. Exports can also be high priority self-schedule labeled as PTK (i.e., not backed by capacity that may be committed to ISO load under its resource adequacy program). If the market clearing process encounters constraints, the ISO will treat PTK

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power balance constraint to be relaxed and reducing PTK (high priority) exports to allow RUC to clear. Figure 33 shows the RUC infeasibility against two reference points: one infeasibility is relative to the final adjusted forecast in RUC, while the other is relative to the raw day-ahead forecast. In September oversupply condition occurred more frequently than August due to more moderate loads. RUC undersupply infeasibilities were triggered in a few hours on September 5 to September 8 when ISO experienced not high loads but also the peak for the year.





In addition to relaxing the power balance constraint, the RUC process utilized other scheduling priorities to enforce the power balance. Indeed, before relaxing the power balance (and based on current scheduling priorities), RUC will first reduce economic exports (exports bid-in at a given price) and lower priority price-taker exports. Only when RUC has exhausted these LPT exports, PT exports may be reduced concurrently to relaxing the power balance constraint.¹⁵

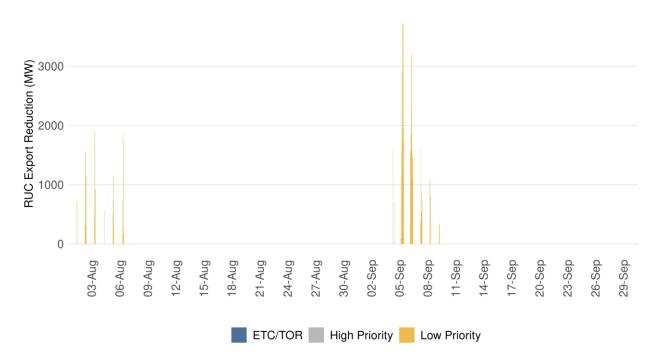
exports similar to internal loads, but treats LPT exports as recallable, and the market will reduced LPT exports before relaxing the power balance constraint.

¹⁵ Under the current setup of scheduling priorities, PT exports and the RUC power balance constraint have the same priority reflected with the same penalty price utilized in the market optimization. What level of reductions relative to the level of power balance relaxation is achieved will depend on many other conditions in the optimization process, such as the location of the exports that may look more or less attractive for reduction in comparison to the power balance. Thus, typically both export reduction and power balance infeasibilities can be observed in an RUC solution under tight supply conditions.

In the month of September there were instances of export reductions in the RUC process. Exports can still participate in the real-time market by rebidding relative to the DAM solution, or directly into the real-time market with either high or low priority, as well as with economical bids.

Figure 34 shows the instances when the RUC market reduced exports in September, with the largest reduction happening on September 5 mainly for low priority exports. These reductions were observed during the times when WECC load was the highest and set a new peak records. ISO area was already clearing over 6,000 MW of exports, and these export reductions reflect the level of additional exports that could not be supported. Figure 35 shows the instances when the real – time market reduced exports in September, with the largest reduction happening on September 28 of about 465 MW. The decrease in exports for September was attributed to NOB intertie, resulting from a derate caused by an outage on the Los Banos – Midway #2 500 kV line.





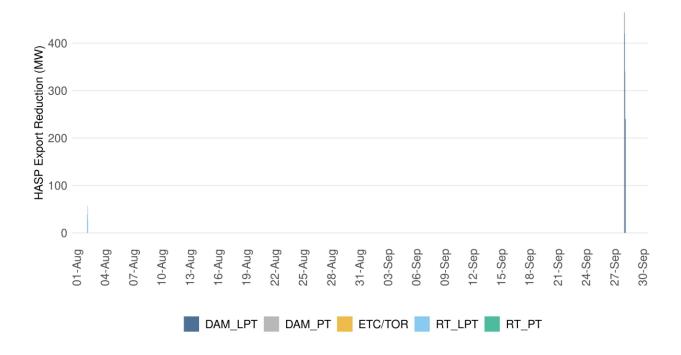


Figure 35: Exports reductions in HASP for August and September 2024

Load Conformance

Load conformance effectively modifies the final load requirement the markets need to clear against supply. In all ISO markets, except the IFM where demand is bid in, system operators can adjust either demand (through conformance) or supply (through Exceptional Dispatches, or EDs) based on expected system conditions. Changes to market inputs can influence market clearing prices. The adjustment to the load forecast in the day-ahead timeframe is referred as RUC net short, while in the real-time market it is referred to as Load conformance. These adjustments can effectively increase or decrease the overall demand requirements that the market optimization uses to clear against supply. Operators may use load adjustments to true up the market to the real-time system based on projected or observed system conditions. Positive conformance effectively increases the load requirements while negative conformance decreases the load requirements.

Figure 36 shows the daily distribution of load conformance for all the markets for the month of September. The figure illustrates the daily distribution of load conformance in RUC, FMM and RTD markets for the month of September. Because simple averages may not reflect the more complex dynamics of load conformance, these trends are shown as box-plot distribution. The box represents the 25th to the 75th percentile while the dot represents the outliers. It shows that the load conformance for the RUC market reached a maximum of about 5,268 MW for September 8. The FMM market generally reflect the operator efforts to ensure that adequate balancing energy is available for real-time system conditions. Load conformance used in real-time is generally much lower than FMM market, because it serves more to manage the actual imbalances in real time. In the month of September, similar pattern was observed

where FMM load conformance adjustment was as high as 3,700 MW on September 7 during the peak hours. The RTD market had load conformance adjustments between -2,000 MW and +4,000 MW in September. On September 21, trade hours 16 and 17, RTD conformance was between -1,000 and -2,000 MW because there was about 2,000 MW to 3,000 MW of load conformance in FMM due to software issues. Coming into RTD market, due to lower load, the RTD load was conformed down by about 1,000 to 2,000 MW. On September 25, trade hour 10 and 11, RTD bias values peak at 4,000 MW with many others above 3,000 MW due to operating reserves went below the requirement due to heavy regulation up usage. The RTD bias was increased from 600 MW to about 4,000MW to maintain ACE, frequency and operating reserves while dealing with data quality and load forecast issues.

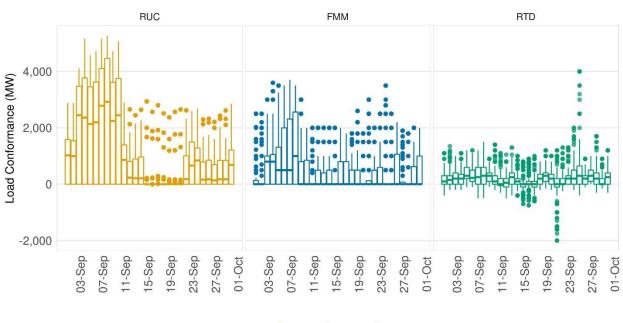






Figure 37 shows the hourly distribution of load conformance adjustment for the month of September by markets. The RUC load conformance adjustment shows a typical pattern across the month of having adjustments during the morning and evening peak hours. Similarly, FMM load conformance shows a pattern with high adjustment during the evening peak hours from HE 17 – 21. RTD load conformance shows a different pattern with negative conformance during the middle hours of the day due to oversupply conditions and positive conformance during the evening peak hours.

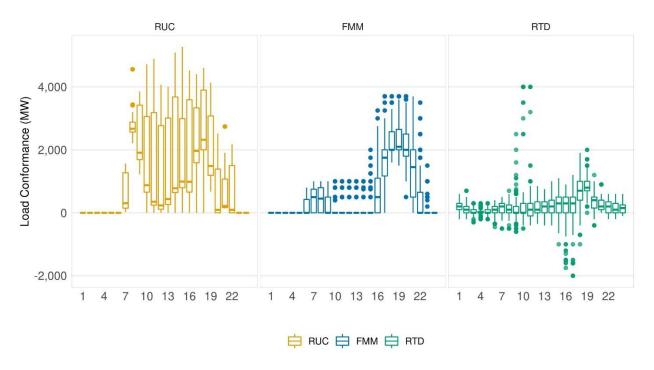


Figure 37: Hourly load conformance for the month of September 2024 - by market

Figure 38 shows the hourly profile of load conformance for September 4 – 6, 2024 across markets. Although he patterns follow largely the typical load conformance profile across market, the FMM load conformance exhibits an atypical trend for midday hours with positive and flat values in midday hours. This unique profile reflects the operators intend to better position storage resources for charging early in the day to have as much as feasible state of charge for later hours in the day. This was an exploratory approach that was no longer used moving forward.

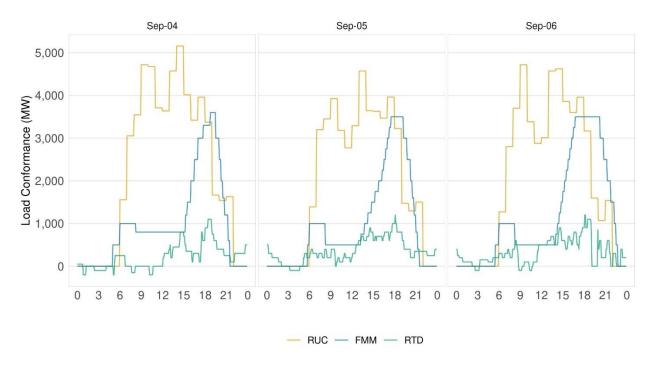


Figure 38: Hourly load conformance for September 4 - 6, 2024

Demand Response

The ISO markets consider demand response programs designed to reduce demand based on system needs and trigger demand response programs through market dispatches. In the ISO's markets, there are two main market programs for demand response: economic (proxy) and reliability demand response. These programs use supply-type participation models that can be dispatched similar to conventional generating resources.

Figure *39* shows the dispatch for proxy demand resources (PDR) in both the day-ahead and real-time markets. PDRs are dispatched economically in all markets based on their bid-in prices. During the month of September, PDR resources were consistently dispatched in the day-ahead market. The largest volume of PDR dispatches in the day-ahead timeframe occurred on September 5 at about 191 MW, whereas in the real-time market, it was a maximum of 154 MW on September 5.

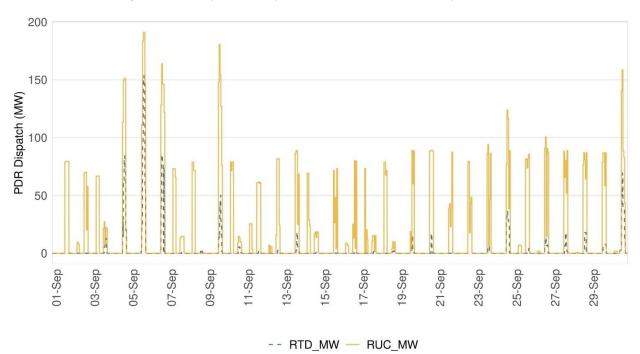


Figure 39: PDR Dispatches in day-ahead and real-time markets in September 2024

Reliability demand response resources (RDRRs) were triggered in the real-time market during September. Figure 40 shows the dispatches of RDRRs in both the day-ahead and real-time markets. In the day-ahead market, these types of resources can be dispatched based on economics. The real-time market will consider these DAM dispatches as self-schedules. Therefore, these RDRRs will be dispatched in the realtime market even when there is no energy emergency alert declaration. The largest volume of RDRR dispatches in the real-time market was on September 5 of about 195 MW for HE 20. RDRRs were dispatched in RUC and RTD market to the same amount of 195 MW, hence the yellow line for RUC MW and blue line for RTD MW are overlapping.

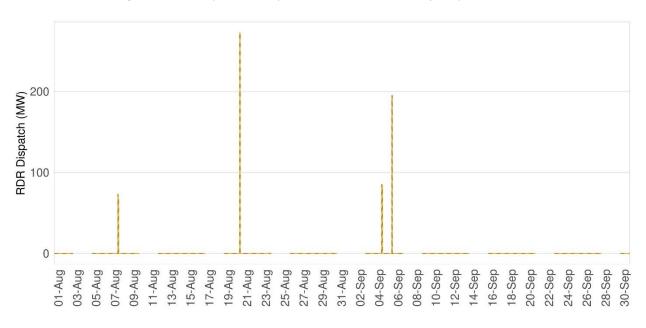


Figure 40: RDRR dispatches in day-ahead and real-time markets for September 2024

-- RTD_MW - RUC_MW

5 Intertie Transactions

The ISO's system relies on imports that arrive into the balancing authority area through various interties, including Malin and NOB from the Northwest and Palo Verde and Mead from the Southwest. Interties are generally grouped into static imports and exports, or dynamic and pseudo tie resources, which are generally resource-specific. Similar to internal supply resources, interties can participate in both the day-ahead and real-time markets through bids and self-schedules. Additionally, the ISO's markets offer the flexibility to organize pair-wise imports and exports to define wheels. This transaction defines a static import and export at given intertie scheduling points, which are paired into the system to ensure both parts of the transactions will always clear at the same level. Because wheel transactions must be balanced, they do not add or subtract supply to the overall ISO system, regardless of the cleared level. However, they utilize scheduling capacity on interties and transmission capacity on ISO's internal transmission system. All intertie transactions will compete for scheduling and transmission system.

Economic bids for imports are treated similarly to internal supply bids, while exports are treated similarly to demand bids, or fixed load through the load forecast feeds. These bids are bounded between the bid floor (-\$150/MWh) and bid cap (\$1,000/MWh or \$2,000/MWh). Each part of a wheel is also treated accordingly as supply or demand, but its net bid position is defined as the spread between its import and export legs.

Intertie transactions also have the flexibility to self-schedule. The ISO's market utilizes a series of selfschedules which define higher priorities than economic bids based on the attributes applicable to resources. Participants with such entitlements can submit intertie self-schedules using transmission ownership rights (TORs) or Existing Transmission Contracts (ETCs), as well as PTK and LPT.

The ISO's markets will clear intertie transactions utilizing its least-cost optimization process in each of its market runs. Bids and self-schedules are considered in a merit order to determine the clearing schedules, and all resource bids and characteristics, and system conditions, are taken into account. In the upward direction, when supply capacity is limited, imports with self-schedules clear first, followed by economic bids from cheapest to most expensive up to the level of the market clearing price. Conversely, exports will clear first for ETC/TORs, then PTK exports, followed by LPT exports and lastly economic bids from most expensive to cheapest. Wheel transactions have a higher priority in the clearing process defined as the relative spread of penalty prices between the import and export sides.

Intertie supply

Figure 41 shows the capacity from static export transactions in the day-ahead market organized by types of exports. This capacity does not include export capacity associated with wheel transactions of any type because wheels are in balance on a net basis, and the export side of wheels does not reduce supply to the ISO supply stack.

This figure also illustrates the clearing schedules from the RUC process with the line in green. The RUC schedules are used as reference instead of the IFM schedules because they are the relevant schedules for clearing interties in the day-ahead market.

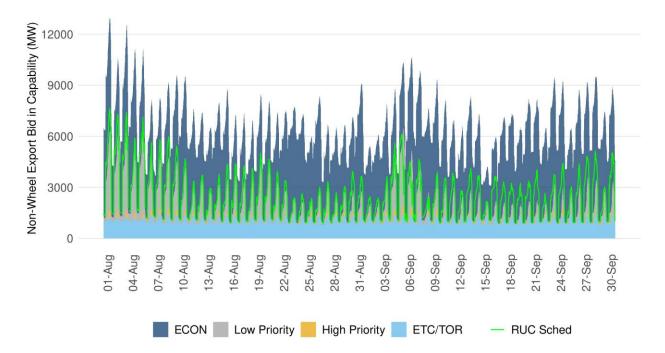


Figure 41: Day-ahead Bid-in capacity and RUC cleared export

The RUC schedule represents the expected delivery and E-tags that market participants should submit in the pre-scheduling timeframe, and not the IFM schedule. While not required to submit their E-tags in the day-ahead timeframe, market participants are encouraged to do so and in such cases should base their E-tag on the RUC schedule. If not, E-tags greater than RUC schedules may be adjusted by the ISO. This applies to all dynamic and static intertie schedules.

Export bid capacity in the day-ahead market varies by hour and typically follows a daily profile. About 67 percent, 14 percent, 17 percent and 1 percent of the export capacity were for economic bids, LPT, ETC/TOR and PTK, respectively. There were smaller volumes of LPT in September comparing to August, resulting in a slightly lower total of bid in export volume. The highest RUC scheduled was in hour ending 13 on September 5, at about 6,125 MW.

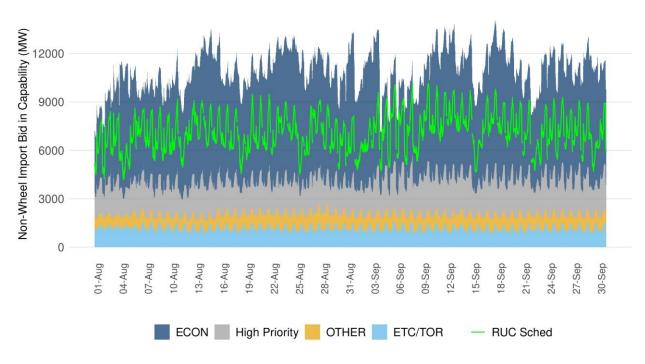


Figure 42: Day-ahead bid-in capacity and RUC-cleared imports

Figure 42 shows the same metric for imports. These volumes include both static imports and dynamic resources. Both ETC/TOR remained relatively stable through the months. There were similar volumes of economic bids in September comparing to August. The "other" group includes regulatory must run priority capacity and the portion of Pmin for dynamic resources with a Pmin above 0 MW.

Figure 43 shows the overall intertie schedules organized by type of schedule, as well as the net interchange based on the RUC solution for two months. Figure 44 shows the overall intertie RUC schedules during the heatwave, September 4 – 6. The net interchange projected in the RUC process reached its lowest level on September 28 in HE 15 at about 1936 MW due to the higher level of exports cleared.



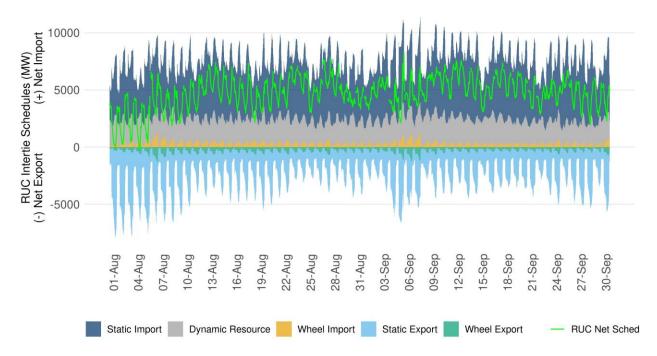
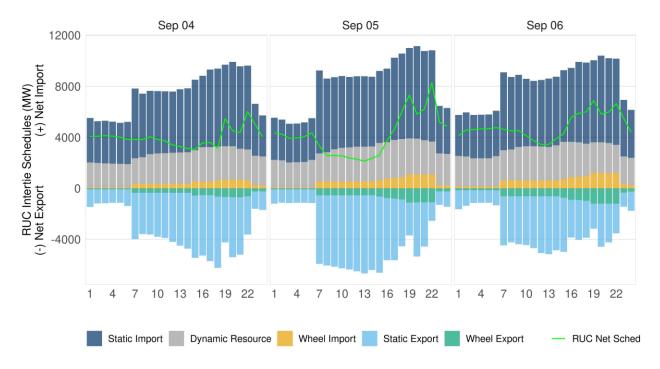


Figure 44: Breakdown of RUC cleared schedules, September 4 - 6, 2024



An area of interest since summer 2020 is the trend of exports in the ISO's system. Figure 45 illustrates the hourly distribution of RUC schedules for exports and that the highest volume occurred during afternoon hours. Comparing to August, September had lower RUC exports for majority of the hours. The highest volumes were cleared in hour ending 17.

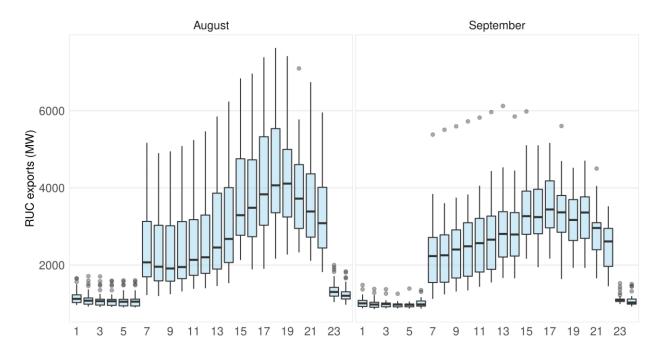


Figure 45: Hourly RUC exports

Intertie positions are largely set from the day-ahead market. Import or exports cleared in the day ahead may tend to self-schedule into the real-time to preserve their day-ahead priority. There may still be incremental participation in the real-time market through the HASP process, which allows resources to bid-in economically to buy back their day-ahead position or additional capacity in the real-time market.

Figure 46 shows both the cleared schedules in real time for interties of different groups, and the net intertie schedules cleared, referred to as net schedule interchange. The net schedule interchange was at its lowest value on September 28 and September 5 primarily due to the high amount of exports cleared on that day. The real-time market largely follows the trend observed in the day-ahead market. The net schedule in September is at a similar scale compared to the majority of days in August. On average, for September, the net schedule in HASP was about 4,764 MW across all the hours of the month and about 4,736 MW for peak hours.

Figure 47 shows the cleared and net schedules during the heatwave, September 4 - 6. The net schedule was close to or below 0 for a few early afternoon hours on September 5.



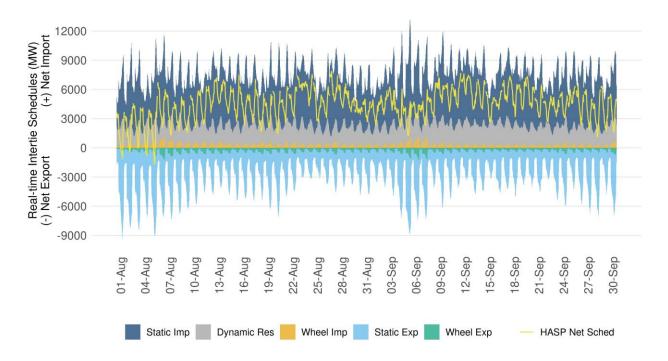
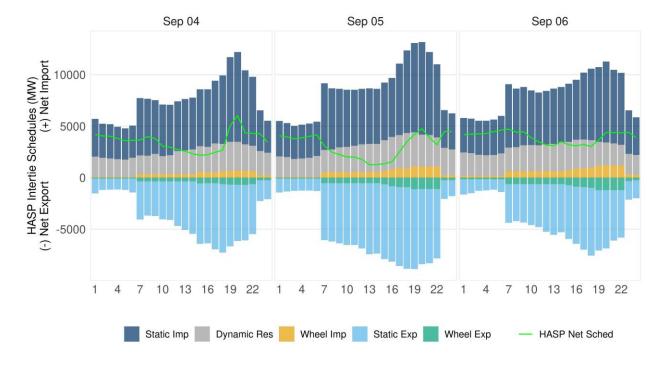


Figure 47: HASP cleared schedules for interties, September 4 – 6, 2024



The HASP market presents an opportunity for interties to clear through the market clearing process after the DAM is complete. Clearing the RUC process indicates that these exports were feasible to flow based on the projected system conditions in RUC, and will be reassessed in real time.¹⁶

Each market, RUC or HASP, can assess reduction of exports based on prevailing system conditions and economics. Export reductions in RUC cannot self-schedule into real-time with day-ahead priority, but they are able to rebid into the real-time market and be fully assessed based on real-time conditions.

Figure 48 shows all the exports cleared in the HASP process and identifies the nature of such exports. Figure 49 shows the exports cleared for the period of September 4 – 6. TOR is for export with scheduling priorities associated with transmission rights. The groups of DAM_PT or DAM_LPT stand for day-ahead exports coming into real-time market as self-schedules with high or low priorities. Similar classification is followed for those high and low priority exports coming into real-time directly (RT_PT and RT_LPT). ECON stands for economic exports. These exports are only for non-wheel transactions. A granular breakdown of wheels is provided in a subsequent section of wheels.

The volume of exports cleared in real time peaked at 7,938MW on September 5. In September, lower volumes of exports were cleared comparing to August, and low priority bids constituted a significant portion of cleared exports.

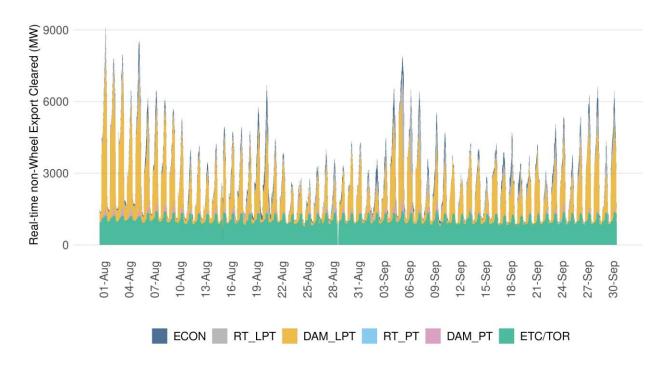


Figure 48: Exports schedules in HASP

¹⁶ Based on these rules implemented on August 4, 2021, through the summer enhancements described earlier and now in place, the ISO will no longer provide exports a higher priority than load in the real-time, and will only provide them equal in priority to load if the participant demonstrates that they continue to be supported by resources contracted to serve external load. Details are available at http://www.caiso.com/Documents/Jun25-2021-

 $[\]underline{OrderAcceptingTariffRevisionsSubject to FurtherCompliance-SummerReadiness-ER21-1790.pdf}$

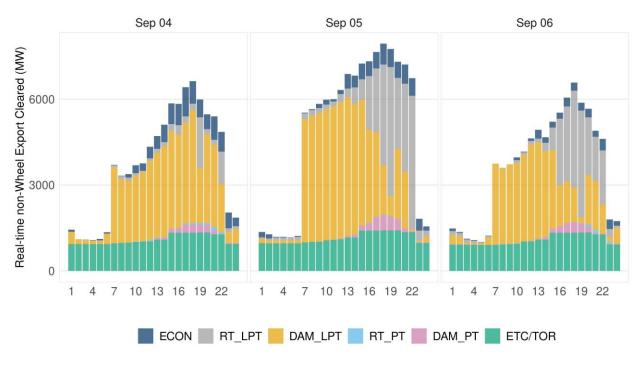


Figure 49: Exports schedules in HASP, September 4 – 6

Imports and exports were scheduled over multiple intertie scheduling points in September, with Malin, Palo Verde and NOB seeing the highest volume of transactions. Figure 50 through Figure 52 illustrate the trend of import and export schedules cleared in HASP for these top three intertie points. In September, the prevailing schedules were in the import direction.

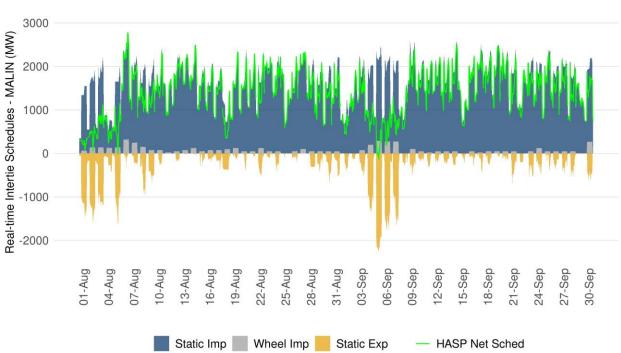


Figure 50: HASP schedules at Malin intertie

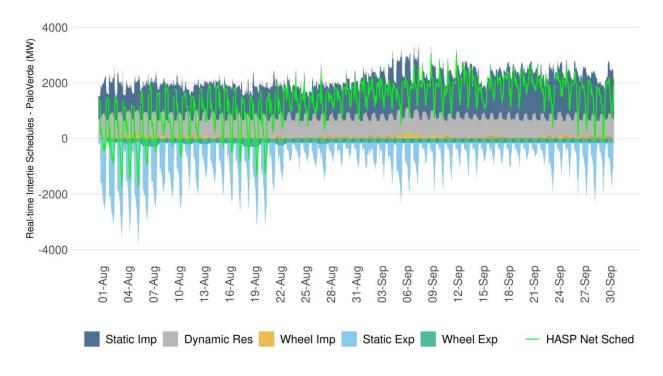
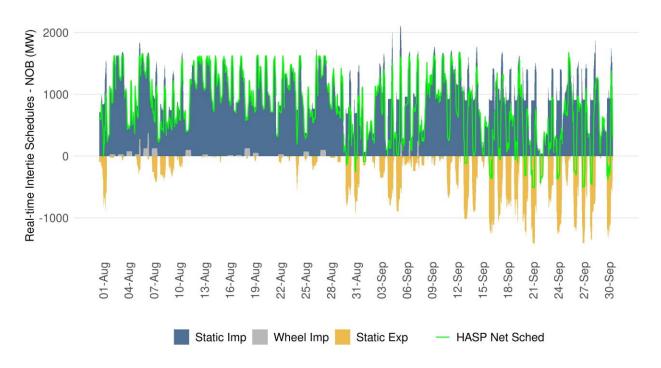


Figure 51: HASP schedules at Palo Verde intertie

Figure 52: HASP schedules at NOB intertie



Resource adequacy imports

Imports can be used to meet Resource Adequacy (RA) requirements and they can be resource-specific or non-resource specific. For simplicity, this analysis relies on static imports as a proxy for non-specific resources. The other type of imports are dynamic or pseudo tie resources, which typically will be resource-specific. The total amount of RA supported by static imports in September was about 3,972 MW related to LSEs under CPUC jurisdiction.

Under the CPUC's RA rules, non-resource specific RA imports for LSEs under CPUC jurisdiction must selfschedule or bid economically with prices between -\$150/MWh and \$0/MWh at least for the availability assessment hours. Figure 53 shows the supply bid in the day-ahead market by static RA imports associated with LSEs under CPUC jurisdiction and for hours ending 17 through 21 of weekdays only. This supply is organized by price range, including self-schedules, and also differentiates between RA capacity and above RA capacity. Based on this subset, about 99.9 percent of all RA import capacity bid with either selfschedules or economic bids at or below \$0/MWh in the day ahead timeframe in September. There was only one RA import that bid about 30 MW less on September 30.

This plot also shows the cleared imports, which largely utilized all the bid-in volume for RA and above RA.

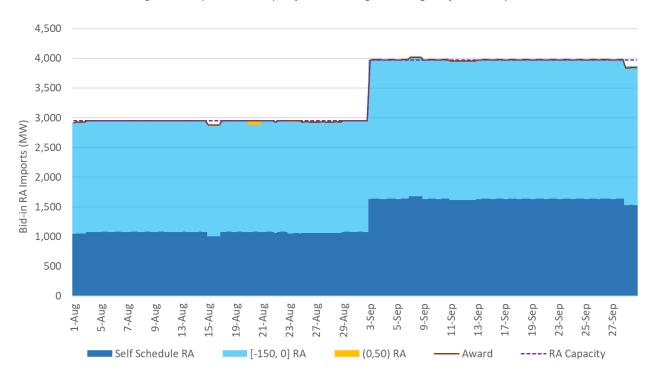


Figure 53: Day-Ahead RA import for hour endings 17 through 21 for weekdays

Figure 54 shows the same information for the real-time market using the HASP bids and awards. All CPUCjurisdictional RA imports submitted in the real-time market were with self-schedules. About 99.9 percent of RA imports bid with self-schedules or economic bids below \$0/MWh. There was only one RA import that bid about 30 MW less than its RA capacity on September 30.

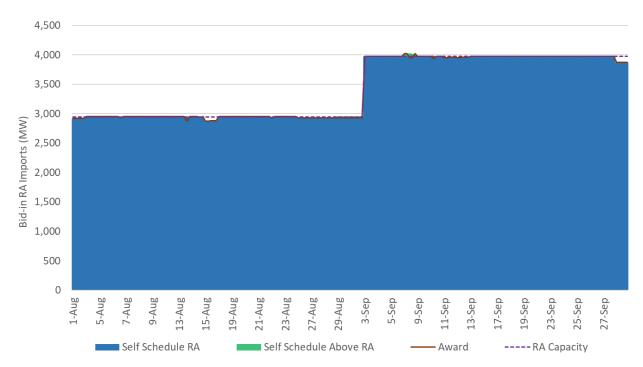


Figure 54: HASP RA import for hour endings 17 through 21 for weekdays

Wheel Transactions

With the summer enhancements for exports, loads and wheeling scheduling priorities extended for summer 2024, wheels can seek higher priority for their wheels.¹⁷ For the month of September 2024, there was a total of 510 MW of high-priority wheels from five different scheduling coordinators. Table 1 lists all the wheel-through definitions used in September.

	Sink						
Source	MCCULLOUG500	MEAD230	PVWEST	SYLMAR			
IPP				25			
NOB		250					
PVWEST				10			
RDM230	75		150				
Grand Total				510			

Table 1. V	Vheel-through	quantities	registered	for S	eptember	2024

Once these transactions are granted high priority, they can be scheduled in the ISO's markets and receive a high scheduling priority. Scheduling coordinators can opt to utilize these wheels on an hourly basis through the month.

¹⁷ For more information on the enhancements implemented for estimating the priority wheel through capacity - <u>https://stakeholdercenter.caiso.com/StakeholderInitiatives/Transmission-service-and-market-scheduling-priorities</u>

Figure 55 shows the hourly high and low priority wheels cleared in the RUC process throughout the month. ETC/TOR wheels are excluded. Wheels participating in the day-ahead market with high- and low-scheduling priority, reached a total maximum at 755 MW on September 6, with 475 MW of high priority and 280 MW of low priority wheels.

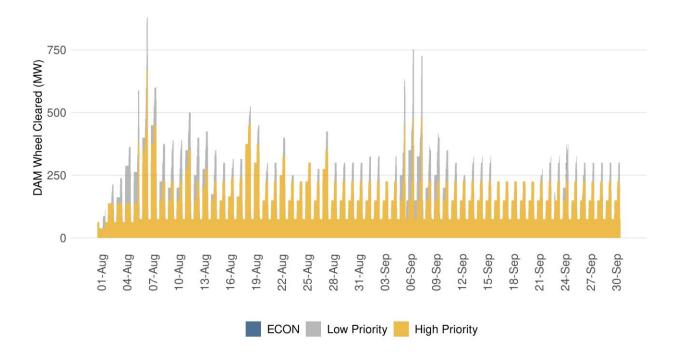


Figure 55: Hourly volume high- and low-priority wheels cleared in RUC

Wheels are defined with a source and sink location in the ISO's markets to factor in their contribution to the flows on either intertie constraints or internal transmission constraints.

Figure 56 summarizes the hourly average of wheels organized by source and sink combinations. An empty entry reflects that no wheels were present for that given source-to-sink combination in September. Source refers to the import scheduling point while sink refers to the export scheduling point. The path with the largest volume of wheels in September in the day-ahead market was from RDM (Round Mountain located in norther California) to PVWest (Palo Verde located in Southern California).

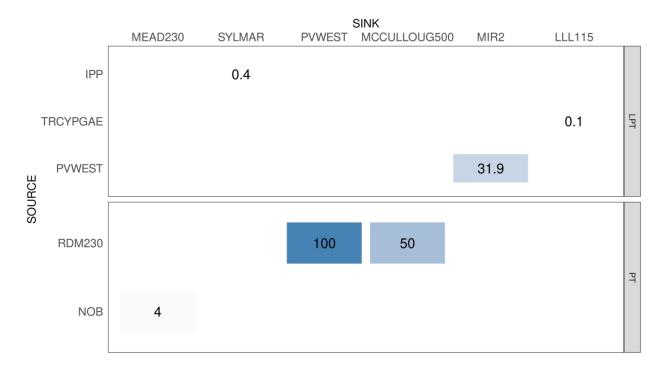


Figure 56: Hourly average volume (MWh) of wheels by path in September

Figure 57 summarizes the maximum hourly wheels cleared in any hour in September in the day-ahead market by source-to-sink combination. The maximum volume of wheels in a given path occurred from PVWest to MIR2 (Mirage locations).

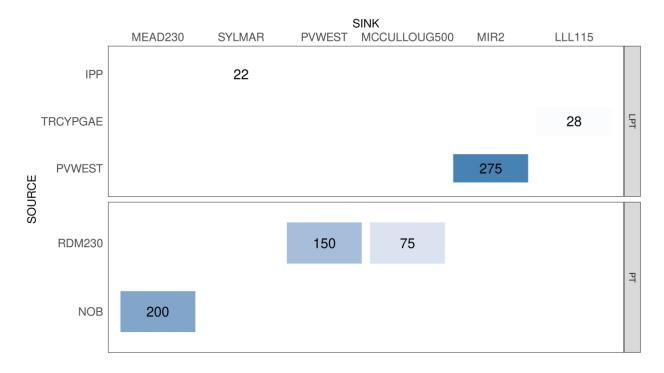


Figure 57: Maximum hourly volume (MW) of wheels by path in September

Although wheels do not add or subtract capacity to the overall power balance of the ISO market, they compete for limited scheduling and transmission capacity.

Wheels cleared in the day-ahead market can be carried over into the real-time market with a day-ahead priority or be directly self-scheduled in HASP process. Figure 58 shows the volume of high- and low-priority wheels cleared eventually in the real-time market, organized by the various types of priority and relative changes.

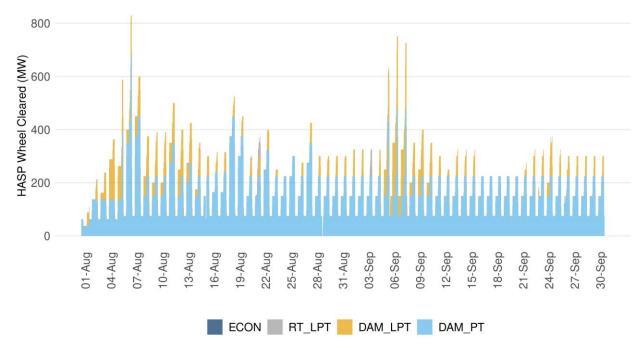


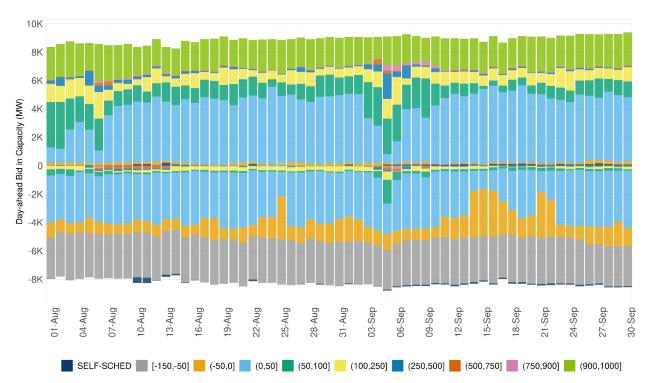
Figure 58: Wheels cleared in real-time market

The *DAM_*PT is for wheel-through transactions with high priority that cleared in the day-ahead market and then rebid into real-time. RT_PT is high priority that came in directly into real-time market. DAM_LPT is for wheels with low priority cleared in day-ahead and rebid into real-time. Similarly. RT_LPT is for wheels bid in directly into real time. Econ is for economical wheels. The volume of wheels bid in directly into real time was negligible.

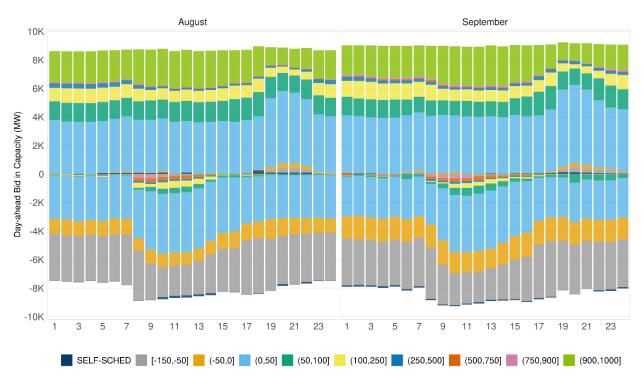
6 Storage and Hybrid Resources

In September 2024, there were 172 storage resources registered in the ISO market. Storage resource here refers to the Limited Energy Storage Resource (LESR) type. Most storage resources participated in both the energy and ancillary service market. Batteries can arbitrage the energy price by consuming energy (charging) when prices are low, then subsequently delivering energy (discharging) during market intervals when prices are higher. Each storage resource has a maximum storage capability that reflects the physical ability of the resource to store energy.

The total state of charge from all the active resources participating in the market was 38,921 MWh. In terms of the capacity made available to the markets, Figure 59 and Figure 60 present the daily average and the hourly average of bid-in capacity for storage resources in the day-ahead market in August and September, organized by price ranges.









The negative area represents charging while the positive area represents discharging. The overall capacity in the market was roughly consistent through the months, staying above 8,000 MW. The bid-in capacity is organized by \$/MWh price ranges. There were consistent patterns of batteries bidding to charge at negative prices and discharge at positive prices. Some resources bid reflected the willingness to charge when prices were up to \$50. Conversely, they were almost always willing to discharge at higher prices. The green segments show bids close to or at the soft energy bid cap of \$1,000/MWh and show that there was a certain volume of storage capacity expecting to discharge only at these high prices.

Figure 61 and Figure 62 present the bid-in capacity for the real-time market. The overall capacity follows the similar trend as the day-ahead market.

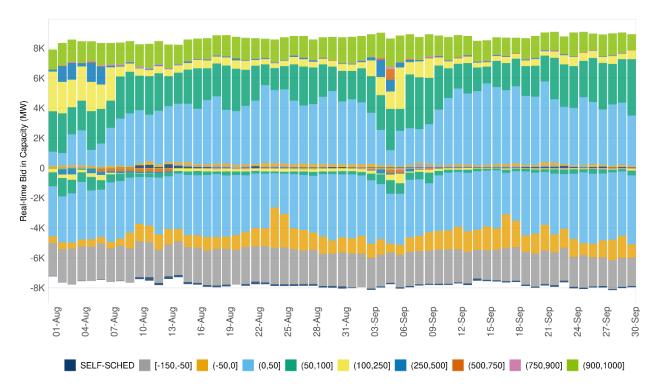


Figure 61: Bid-in capacity for batteries in the real-time market, daily average

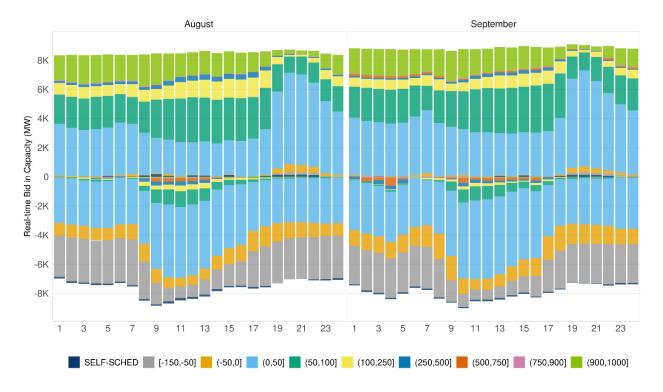


Figure 62: Bid-in capacity for batteries in the real-time market, hourly average

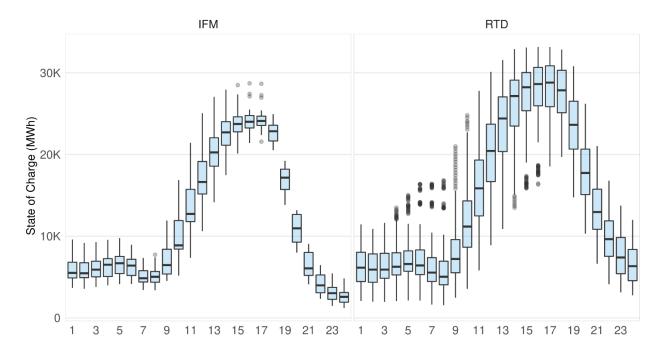


Figure 63: Distributions of state of charge for September 2024

Figure 63 shows the hourly distribution of the storage capacity of resources participating in IFM and RTD for September. The box plot shows the median, 25th percentile, 75th percentile, and outliers for the total state of charge. Storage resources charge in hours when there is abundantly cheap energy from solar resources in the daytime, between hours ending 9 to 18. The system reached maximum stored energy by hour ending 16, followed by a period of steady discharge from hours ending 18 through 24. In September, the highest system state of charge in IFM was around 28,714 MWh, roughly 74 percent of the total capacity, which occurred in the hour ending 16. The peak hourly state of charge in the real-time market was 33,178 MWh in hour ending 16, at roughly 85 percent of the total capacity, higher than the day-ahead peak state of change. Also, the state of charge in the real-time market had a wider spread compared to the day-ahead market.

Most of the storage resources in the ISO market are four-hour batteries, which implies that if a resource is fully charged, it will take four hours to discharge this resource completely. To arbitrage prices, it is expected that the resource would be charged as much as possible just prior to the hours with high energy prices. With the need for more supply as solar production diminishes, it is expected that storage resources would be discharging during net load peak hours. Figure 64 shows the distributions of energy awards in IFM, and Figure 65 shows the hourly distribution of real-time dispatch for batteries in August and September. These statistics are for batteries, either stand alone or the battery component of co-located resources; they do not include hybrid resources.

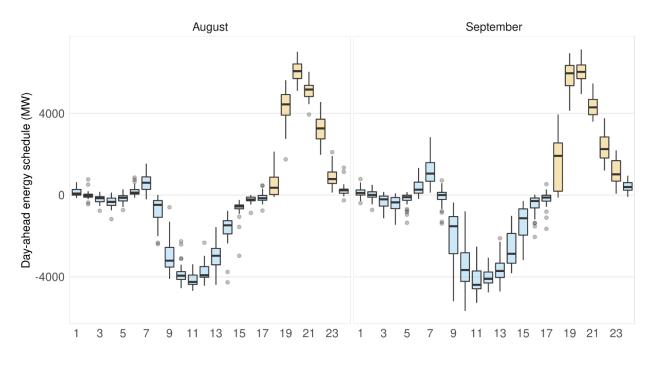
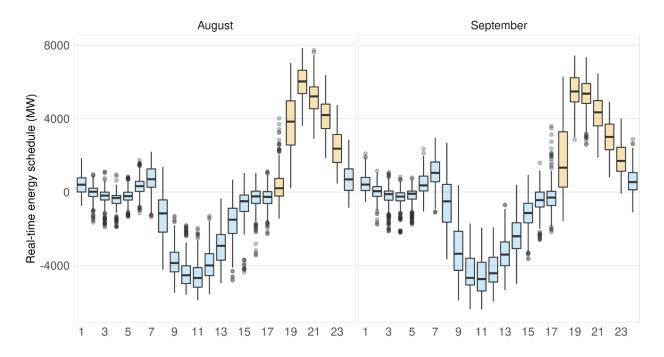




Figure 65: Hourly distribution of real-time dispatch for batteries



The storage resources continue to provide ancillary services to the market for the following products: regulation up, regulation down, spinning reserve, and non-spinning reserve. Figure 66 shows the average hourly AS awards in the real-time market.

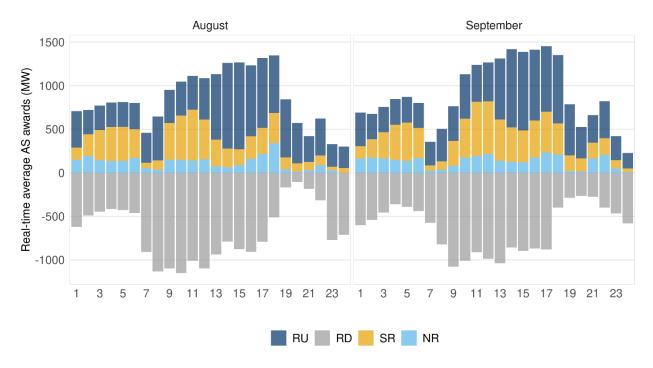


Figure 66: Hourly average real-time storage AS awards

Beginning with the implementation of the Hybrid Resources Phase 2B project in February 2023, the ISO began tracking more formally the market performance of hybrid resources. Hybrid resources are different resource types that sit behind a single resource ID – typically a solar resource paired with a storage resource.

Figure 67 and Figure 68 show the IFM and real-time energy awards for hybrid resources, respectively. The pattern matches more closely the dispatch patterns of solar resources with some differences. The energy awards dip in the middle of the day when solar resources typically reach peak output. This is likely due to the energy storage component of the resource charging off of the solar component of the resource, resulting in a lower energy award. Another notable difference is that the evening ramp down as the sun sets is less steep compared to solar resources. This pattern is attributed to the storage component of the resource discharging in these evening hours, offsetting the decreased production of the solar component and resulting in a flatter decline in output. The energy schedules in September remain similar in the midday hours comparing to schedules in August, in both day ahead and the real time markets.

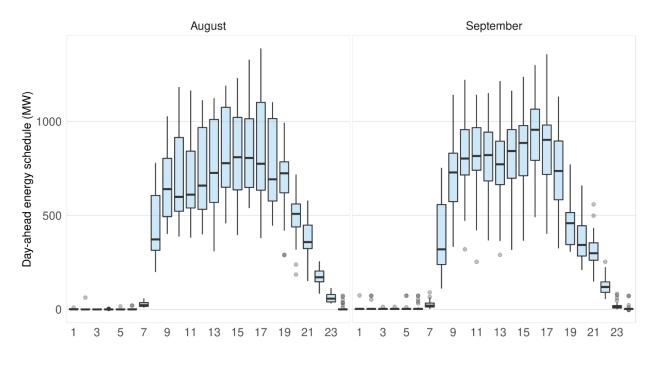


Figure 67: Hourly distribution of IFM energy awards for hybrid resources

Figure 68: Hourly distribution of real-time dispatch for hybrid resources

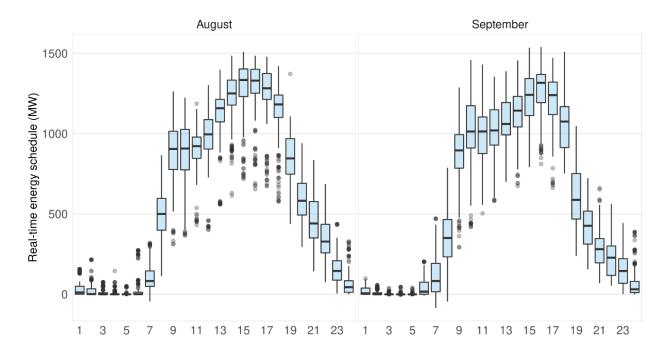
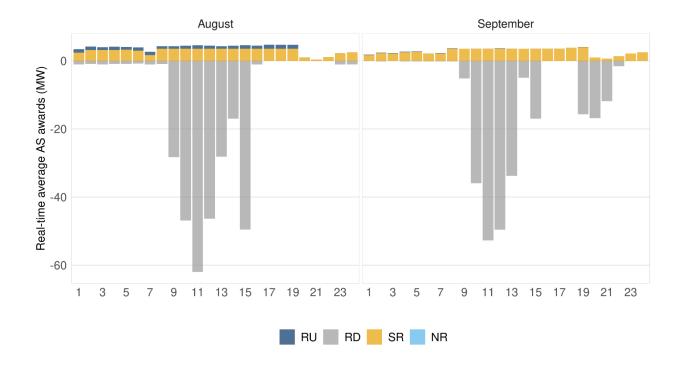


Figure 69 shows the average hourly AS awards in real-time August and September 2024.

Figure 69: Hourly average real-time hybrid AS awards



7 Western Energy Imbalance Market

Peak Load

With the two heat events across the Western Interconnection impacting different regions at the beginning and end of the month, demand peaks at different days and times in the different regions of the WEIM footprint. Figure 70 shows the daily peak load aggregated by WEIM regions for the month of September¹⁸. The California region reached a maximum of 58,528 MW on September 5. Within the two months of August and September, the Central/Mountain reached a peak of 15,226 MW on August 6. However Pacific Northwest reached a maximum of 33,760 MW on August 1. Southwest WEIM region reached a maximum load of about 30,209 MW on August 4. The figure shows the circle marker indicating the peak load for that region for the month of August and September.

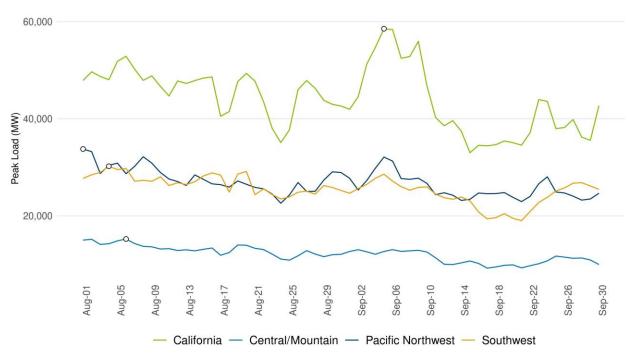
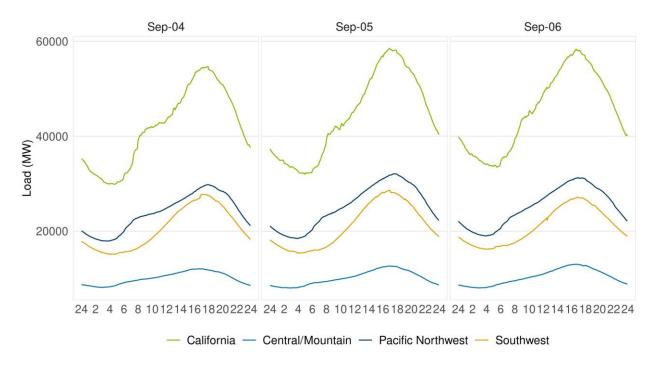




Figure 71 shows the hourly profile of actual load for the WEIM regions for September 4 – 6, 2024. ISO region peaked later in the day relative to other regions, while the central area tended to peak earlier in the day.

¹⁸ These regions are only for display purposes of the regional dynamics. The WEIM market clears supply and demand for each individual balancing area.





WEIM transfers

The Western Energy Imbalance Market, or WEIM, provides an opportunity for participating balancing authority areas to serve their load while realizing the benefits of increased resource diversity. The ISO estimates WEIM's gross economic benefits on a quarterly basis.¹⁹ One main benefit of the WEIM is the realized economic transfers among areas. These transfers are the realization of a least-cost dispatch by reducing more expensive generation in one area and replacing it with cheaper generation from other area. In a given interval, import and export transfers can concurrently happen for one area. In September, the ISO did not apply any transfer limits to dynamic transfers.

Figure 72 shows the distribution of five-minute WEIM transfers for the ISO area. A negative value represents an import into the ISO from other WEIM entities. In September the majority of the transfers were exports from ISO area to other areas in the WEIM. However with the exception of heat wave event from September 4 – 7, where daily average of transfers were in the net import direction. This further added to the dynamic of hourly exports cleared in the ISO market to support other areas in the west.

¹⁹ The WEIM quarterly reports are available at <u>https://www.westerneim.com/pages/default.aspx</u>

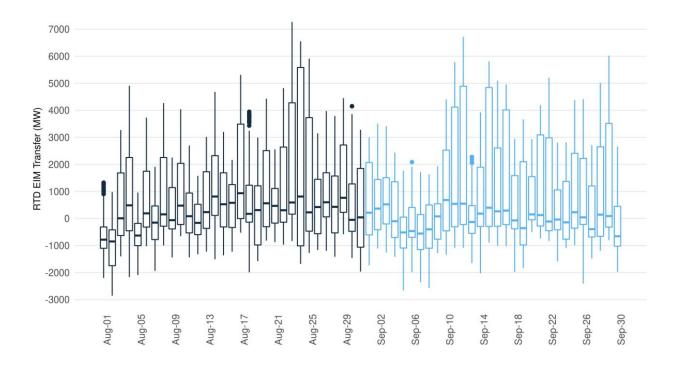


Figure 72: Daily distribution of WEIM transfers for ISO area in RTD

Figure 73: Hourly distribution of 5-minute WEIM transfers for ISO area

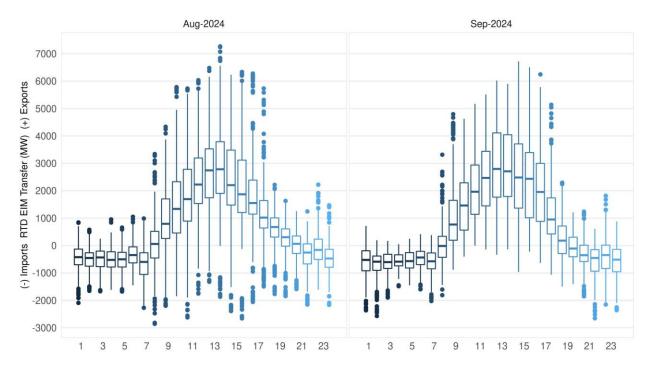


Figure 73 shows the WEIM transfers in an hourly distribution, which highlights the typical profile of the ISO transfers which are generally export transfers during periods of solar production. During the evening ramp as the evening peak approaches, the transfers become a net import to the ISO area. This trend is

MPP/MP&AA

typical across summer months. Figure 75 shows the daily distribution of WEIM transfers across regions in the RTD market. It shows that the California region was importing energy through the transfers during the initial part of the month from September 4 - 8.

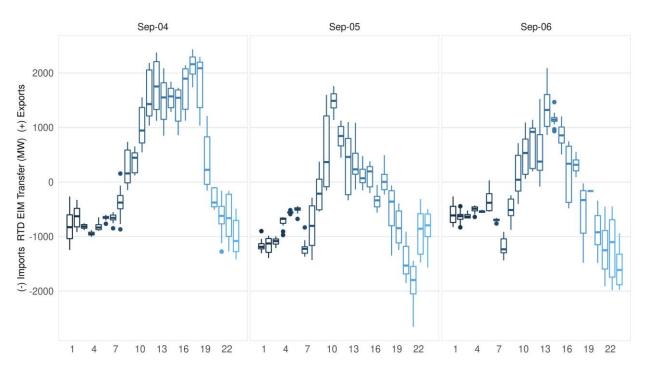
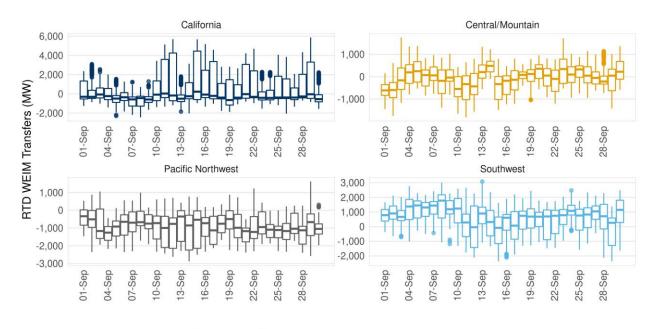


Figure 74: Hourly distribution of 5-min ISO WEIM transfers for –September 4 - 6, 2024

Figure 75: Daily distribution of 5-min WEIM transfers across regions



Ė California 븓 Central/Mountain Ė Pacific Northwest Ė Southwest

Figure 76 and Figure 77 shows the hourly distribution of WEIM transfers across regions for the heat wave event from September 4 – 6, 2024 and for the month of September respectively. It shows that there is a clear pattern from Figure 77 that shows that California region exports during the middle hours of the day while importing transfers during the evening peak. The same pattern does not hold true for the heat wave event for September 4 – 6 due to higher amount of imports coming through.

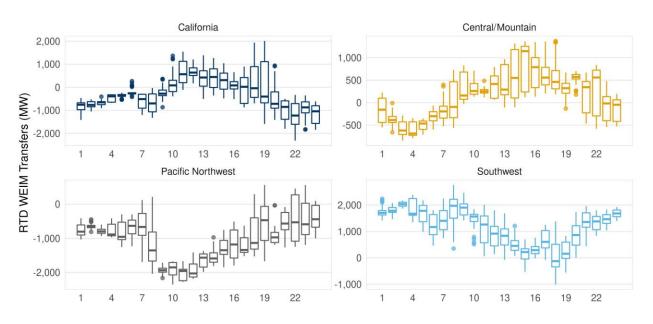


Figure 76: Hourly distribution of 5-min WEIM transfers across regions for September 4 – 6, 2024

🛱 California 🛱 Central/Mountain 🛱 Pacific Northwest 📋 Southwest

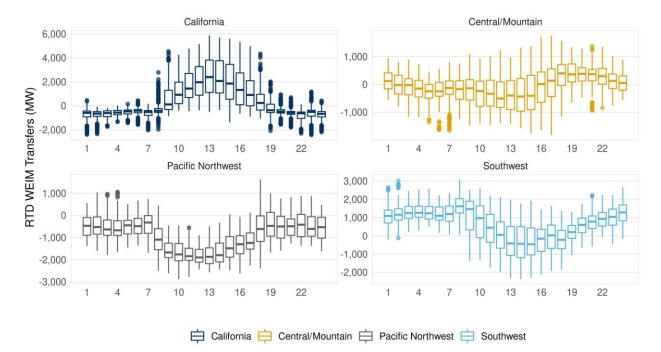


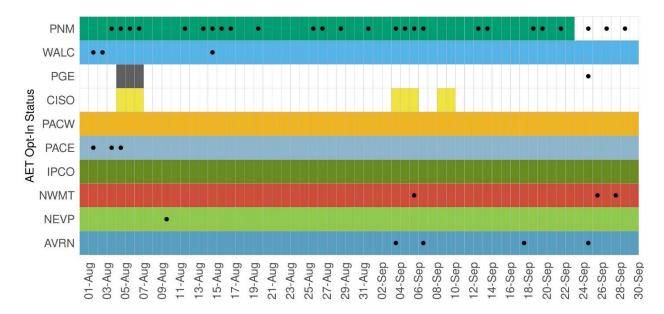
Figure 77: Hourly distribution of 5-min WEIM transfers across regions for the month of September 2024

Assistance Energy Transfer

Assistance Energy Transfer (AET) was implemented with the Resource Sufficiency Evaluation Enhancements Phase 2, Track 1, effort which went live on July 1, 2023. The purpose of AET is to leverage the WEIM for energy assistance during under-supply conditions by optionally allowing incremental transfers at pre-set financial consequence following the failure of the WEIM Resource Sufficiency Evaluation (RSE). Assistance energy transfers are sourced from supply offers that are made voluntarily into the WEIM. Each WEIM BAA may voluntarily opt in to utilize assistance energy by notifying the ISO five business days in advance for a forward requested timeframe.

When a BAA that is not opted into AET fails the RSE, under current market rules, the market limits its WEIM energy transfers to the greater of the transfer amount from the last passed run's interval or the base scheduled transfer amount. If a BAA is opted into AET and fails the RSE in the upward direction, the BAA will still be allowed to receive WEIM energy transfers and pay an after-the-fact surcharge that is calculated based on the applicable energy bid cap of \$1,000/MWh or \$2,000/MWh. The surcharge is only applied to net-import WEIM BAAs and is limited to the lower of the quantity of the upward RSE insufficiency amount or the tagged dynamic transfers.

In September 2024, nine WEIM BAAs opted into AET for some duration of the month. Figure 78 shows eight BAA entities that opted in for each trade date during August 2024 and eight BAA entities in September 2024 with a shaded box indicating opt-in status for that date, whereas ISO opted-in for five days on September 2024. The black dots indicate instances where the BAAs failed the RSE, specifically the upward capacity test and/or the upward flexible ramping test.





RSE Failure

The total AET surcharges assessed in August and September were approximately \$721,045 for all the BAAs that opted in. Figure 79 shows the breakdown of total AET surcharges assessed per day for September 2024. By design, AET is only assessed for WEIM BAAs that fail the RSE and opt in ahead of time. Thus, the AET surcharge was only assessed for a total of eleven trading days in September.

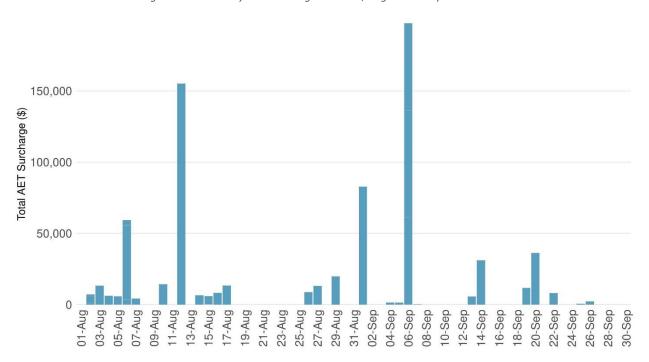


Figure 79: Total daily AET surcharge assessed, August and September 2024

8 Market Costs

The ISO markets are settled based on awards and prices derived from the markets through specific settlement charge codes; these include day-ahead and real-time energy, and ancillary services, among others. The majority of the overall costs accrue on the day-ahead settlements.

Figure 80 shows the daily overall settlements costs for the ISO balancing area; this does not include WEIM settlements. As demand and prices rise, the overall settlements are expected to increase. When considering the overall costs relative to the volume of demand transacted, the dotted red line provides a reference of an average cost per MWh. The average daily cost in September was \$28.65 million, representing an average daily price of \$42.27/MWh. The maximum daily cost of \$107.91 million occurred on September 5.²⁰

Two components of this overall cost are the real-time energy and congestion offsets. These costs reflect the settlements of differences between the day ahead and real-time markets for energy and congestion. These costs typically track system conditions. The daily trend is shown below in Figure 81.

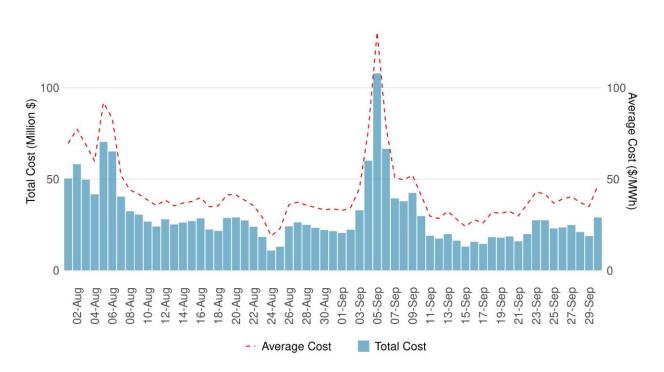


Figure 80: ISO's daily total and average market costs

²⁰ These estimates are based on preliminary settlements data, which are subject to changes in subsequent settlements updates.

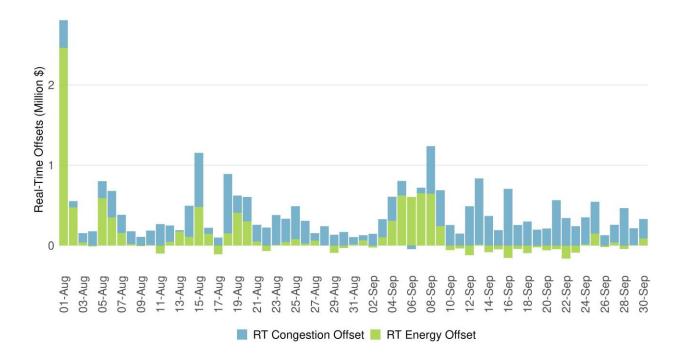


Figure 81: Real-time energy and congestion offsets for ISO area

9 Import market incentives during tight system conditions

On June, 15, 2021, the ISO implemented an enhancement that provides improved incentives for import supplies to be available during tight system conditions because the prior settlement rules may have paid imports less than they bid, which could exacerbate conditions when supplies are tight. During very tight system conditions (*i.e.*, when the ISO has issued an alert by 3 PM PST or a warning or emergency notice), the ISO will provide bid cost make-whole payments for real-time hourly block economic imports rather than simply settling the imports at the FMM price. This feature was implemented as part of summer readiness in 2021.

This feature was not triggered in September 2024.

10 Exceptional Dispatch for Storage resources

Exceptional Dispatch (ED) refers generally to a subset of manual commitment or dispatch instructions that are not determined as a result of the market software in the IFM, RUC, FMM or RTM. ISO operators can issue ED through the ISO's Automated Dispatch System (ADS) or direct communication with the Scheduling Coordinator (SC) and, at times, direct communication with the resource operator. There are several categories of ED, all of which are summarized in Business Practice Manual (Attachment K). As part of the Energy Storage Enhancements, a new functionality was introduced that will allow storage resources to hold a certain state of charge (MWh), in addition to the traditional (MW) exceptional dispatch. This functionality will allow for dispatch of storage resources to charge to and hold a specific level of state of charge for a specific duration of time in the real-time market. For September 2024, there was just one instance of ED to charge SOC to one energy storage resource on September 12.

11 Strategic Reliability Reserves and Non-Market Demand Response

As detailed in Operating procedure 4420, the ISO may access additional supply that is part of California's Strategic Reliability Reserve program. The ISO forecasted significant heat and heightened electricity demands across much of California and the West in early September, particularly on September 5 and September 6. In light of forecasted high temperatures across California, persisting heat that could potentially overtax generators running at high outputs for extended periods of time, and West-wide heat that could potentially limit access to imported energy, the ISO instructed long-start strategic reserve (LS-SRR) resources to start up and remain on standby at minimum operating levels to be ready to provide grid support starting September 5. On September 5 and 6, the ISO continued to forecast high system demands through the day. Out of an abundance of caution, the ISO instructed LS-SRR units to move to dispatchable minimum operating levels (DPmin) on September 5 and 6 by late afternoon hours, which best

positioned units to ramp to meet system needs across evening peak and net peak periods, if needed. On these days, as grid conditions became more certain approaching evening hours, the ISO did not require LS-SRR dispatch above DPmin levels for reliability. Additionally, the ISO forecasted temperatures and demands across California and the West to subside in forward days. The ISO instructed the LS-SRR fleet to shut down by the end of September 6.

Over the weekend, the ISO's forecast for the following week starting September 9, began to firm up. The ISO continued to forecast higher than normal temperatures in California and the broader West on September 9. Additionally, given the persisting heat, the ISO also identified risks of overtaxing generation running for extended periods of time in high heat and risk of reduced imports given high temperatures across the West. The ISO instructed three LS-SRR units to start up and remain on standby at minimum operating levels to be ready to help manage grid conditions starting September 9. On September 9, as projections of grid conditions improved, the ISO did not require LS-SRR dispatch above minimum operating levels for reliability. Additionally, the ISO forecasted demands across California and the West to subside in forward days. The ISO instructed the LS-SRR fleet to shut down after September 9.

Throughout the September heat events, the ISO also received support from out of market demand response programs including the California Energy Commission (CEC) Demand Side Grid Support (DSGS) program and the CPUC Emergency Load Reduction Program (ELRP). The ISO did not call any Flex Alerts, EEA Watch or other EEA levels in September which would trigger the majority of ELRP and DSGS subgroups and options. However, DSGS Option 3 triggered when ISO day-ahead DLAP prices exceeded \$200/MWh. The ISO plans to coordinate with the CEC and CPUC later this year to understand actual load reduction impacts from these programs.

12 Enhancements to Bidding Rules above the Soft Offer Cap

Through the Price Formation Enhancements (PFE) stakeholder working group²¹, market participants requested policy enhancements that would allow resources with intra-day opportunity costs to reflect those costs in their energy bids particularly on days with stressed grid conditions when high prices can exceed the \$1,000/MWh soft offer cap. On August 1, 2024, the ISO made effective two enhancements to the bidding rules for resources to bid above the \$1,000/MWh soft offer cap. The enhancements were to (1) remove the \$1,000/MWh cap on Default Energy Bids (DEBs), and (2) modify the real-time market bid cap for energy storage resources to provide bidding flexibility using a proxy opportunity cost value.

This section reviews the impacts of the new enhancements for the month of September. The analysis concludes that the new functionality was not used in September. Firstly, while there were DEBs calculated above \$1,000/MWh, there were no corresponding bids above \$1,000/MWh. Additionally, the new storage bid cap did not increase above \$1,000/MWh as none of the bid cap components were triggered, and consequently, there were no storage bids above \$1,000/MWh in the market including on days with stressed grid conditions and high prices like September 5.

While stakeholders expressed concern that this policy change could increase prices, the backstops recommended by stakeholders worked and bidding seems competitive. One of the backstops stakeholders recommended was using the 4th highest MIBP instead of the highest, and in the first month of implementation although the MIBP did go over \$1000/MWh the 4th highest did not, which appropriately maintained the cap at \$1000/MWh when prices stayed well below the cap. Some stakeholders were concerned that using the highest cost verified bid would raise the cap for everyone. Data shows that a DEB value did go above \$1000/MWh but that resource still bid competitively and did not result in a higher cap for storage resources.

FERC Order No. 831 requires that bids above \$1,000/MWh be cost verified by market operators. To comply with this order, the ISO uses its "reference level change request" (RLCR) process to verify the costs above \$1,000/MWh. A reference level change request enables suppliers to update their DEBs, and if approved, enables them to bid up to their adjusted DEB if it exceeds the soft offer cap.

The DEB mirrors a resource's competitive marginal costs in the market in conditions when market participants might have market power. Absent perfect information, the DEB serves as a reasonable benchmark for a resource's specific short run marginal costs. Prior to August 1, 2024, all DEBs were capped at \$1,000/MWh when initially calculated, but could be adjusted to above \$1,000/MWh and up to \$2,000/MWh through the RLCR process. However, a resource's DEB might have otherwise been calculated above \$1,000/MWh if not for the cap on the DEB. In this case, though the ISO already has sufficient information to verify the resource's costs, the previous process required the resource's scheduling coordinator to take action through the RLCR process to reflect those costs in the market.

²¹ <u>https://stakeholdercenter.caiso.com/StakeholderInitiatives/Price-formation-enhancements</u>

The RLCR process to adjust the DEB was initially designed to be tailored towards gas resources that faced discrepancies between their actual fuel costs and those that ISO's market systems used to calculate their DEBs. However, it lacks similar functionality for processing changes to the opportunity costs associated with storage, hydro and demand response resources, because the ISO does not have rules to determine a reasonable cost expectation upon which to base an intra-day opportunity cost adjustment request. Without the ability to use the automated RLCR process, hydro and storage resources cannot request DEB adjustments and could not bid above the soft offer cap.

The two enhancements the ISO implemented on August 1, 2024 addresses these issues as follows:

- Removing the \$1,000/MWh cap on DEBs allows fuel or fuel equivalent based generating resources to bid up to a value above \$1,000/MWh that reflects their marginal costs as defined by the DEB, and allows hydro resources to bid up to a value above \$1,000/MWh that reflects their opportunity costs already defined in their DEBs, without needing to take action through the RLCR process.²²
- 2. Modifying the bid cap for energy storage resources allows energy storage resources to bid up to a value above \$1,000/MWh in the real-time market to indicate to the market their intra-day opportunity costs that support their availability for discharge during more stressed grid conditions when prices can exceed the soft offer cap. The new storage bid cap is calculated as:

Storage bid cap = MAX (DEB²³, 1000, 4th highest RTM MIBP²⁴, highest cost-verified bid)

Figure 82 shows that, in September, there were four days when a DEB was calculated above \$1,000/MWh. The DEBs were four resources using a negotiated DEB and were driven by parameters specific to those resources' negotiated DEB calculations.

The storage bid cap remained at \$1,000/MWh in September as none of the components of the storage bid cap calculation exceeded \$1,000/MWh. There were no DEBs for storage resources above \$1,000/MWh. There were no cost-verified bids above \$1,000/MWh either from a RLCR or from a bid above \$1,000/MWh when that resource's DEB was above \$1,000/MWh. The 4th highest RTM MIBP reached a maximum of \$488/MWh on September 5 as shown in Figure 83.

²² Storage DEBs could not be uncapped to go above \$1,000/MWh due to implementation complexities which would delay the implementation of the enhancements

²³ Only applies to storage resources using a DEB option other than the Storage DEB

²⁴ Maximum Import Bid Price

Summer Monthly Performance Report

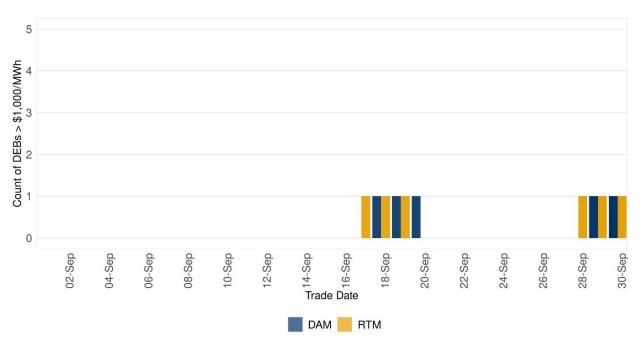


Figure 82: Default Energy Bids (DEBs) calculated above \$1,000/MWh



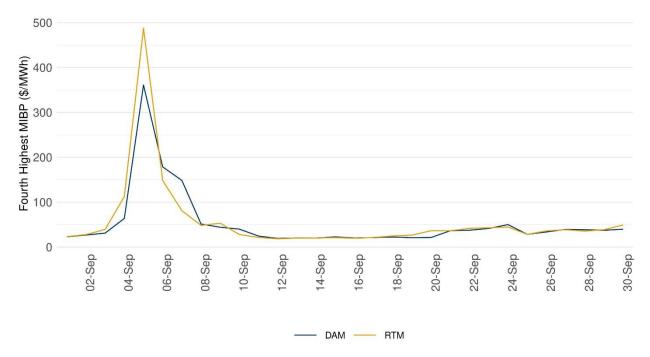


Figure 84 shows that storage resources submitted bids above \$1,000/MWh each day in September in the real-time market, with the most bids above \$1,000/MWh submitted on September 5. There were no storage resource bids in the market above \$1,000/MWh during this period as expected since the storage bid cap remained at \$1,000/MWh.

MPP/MP&AA

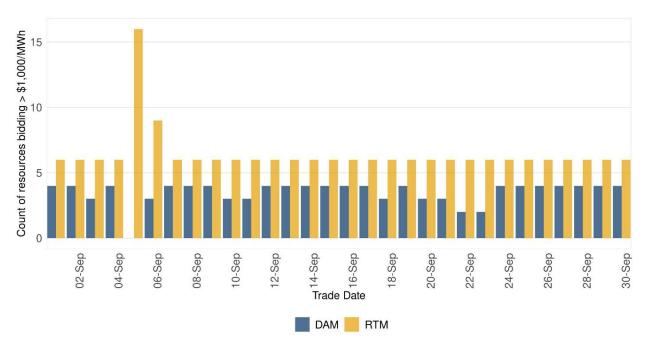


Figure 84: Storage resource bids above \$1,000/MWh during September 2024

13 Areas for Improvement

Through the analysis of the market outcomes and performance, the ISO tracks any areas for improvements. For the month of September, there were no market issues.