

EDAM COMMON DESIGN PRINCIPLES & CONCEPTS

Questions Submitted by	Organization	Date Submitted
<i>Laura Trolese</i>	<i>Bonneville Power Administration</i>	<i>November 4, 2021</i>

I. Participation Commitment, Voluntary Participation

- In the previous EDAM Bundle One Straw Proposal, non-participating load-serving entities would self-schedule generation and load. Will the concept of non-participating loads be retained in an updated EDAM proposal?

II. Transmission Commitment

- What does “otherwise high priority” and “otherwise highly reliable” transmission mean if it is not firm (7-F) or conditional firm/secondary NT (6-CF/6-NN)?
- Is bucket 1 transmission required for a resource to be able to count towards an EDAM Entity’s resource sufficiency evaluation? In other words, does transmission have to be procured by the time of the day-ahead resource sufficiency test (i.e. 9 AM) in order for the underlying resource to be counted towards resource sufficiency?
- Does bucket 3 consist of *unreserved* firm transmission or *unscheduled* firm transmission?

III. Supply Commitment

- What does the CAISO plan to do with the advisory showings? Are there any binding obligations for the advisory showing? Is transmission expected to be included on the advisory showing?
- As above, is Bucket 1 transmission at the time of the RS showing required for supply to qualify for RS?
- What is meant by expected load? P50? What type of reserves are being referred to?
- If the EDAM RSE should not modify any aspect of local generation planning and certification, do the RS requirements default to conform to the least restrictive Resource Adequacy program requirements? And if an Entity’s local Resource Adequacy program and planning requirements are found to be deficient, how will the reliability concern of all entities lowering their resource sufficiency procurement to that standard be addressed and/or the leaning on EDAM by the deficient entity be addressed?
- What happens if resources complying with an entity’s resource planning and resource adequacy programs count towards the EDAM resource sufficiency evaluation but are found to be unreliable/unavailable to the market? If the resource continues to count towards meeting RS, how will the risk of leaving the market short and/or the leaning on EDAM that this creates be addressed?
- When talking about consequences of failure not being punitive as to undermine the benefits of EDAM, what benefits are being referred to? Production cost savings or capacity savings? Both the EDAM Feasibility Assessment and the State Led Market Study showed EDAM would provide marginal production cost savings, but if an entity is

consistently leaning on EDAM for large amounts, that entity could be realizing significant capacity savings. The consequences of failures should be commensurate with the capacity savings benefit the entity is receiving from leaning on EDAM.

- How do you have an equitable application of RSE without a common standard, and how do you have a common standard if all entities qualify resources for RS based on their own RA program?
- Without enforced physical constraint(s), how do you ensure financial consequences do not become an economic alternative to procuring resources ahead of EDAM and coming in resource sufficient?

IV. GHG Accounting

- Is there a high level approach the CAISO is considering for GHG accounting for EDAM that can be shared? How is the CAISO intending to collaborate with state regulators on determining a workable approach?

V. Process

- What is the extent and time commitment and cadence of the proposed work groups?
- What is the relationship of the DAME initiative to the EDAM initiative? Is the DAME proposal continuing to retain the CAISO's ability to RUC after the EDAM market closes? And will RUC (or its equivalent) be retained in every participating EDAM BAA?
- Will external resource participation be considered as part of the EDAM stakeholder process? Bonneville serves load in various other balancing authority areas and will need a way to provide energy and imbalance reserves to those loads if those balancing authorities join EDAM.