

	BPA	CPUC	PG&E	PacifiCorp	Six Cities	Final Resolution
Indicate your organization's support for the proposed changes in draft section 29.11(t), the proposed implementation of the Settlements and Billing for the assistance Energy transfer product.	No comment.	No comment.	<p>PG&amp;E would appreciate clarification of the term "base transfers" and consideration of defining the term in Appendix A. Further clarification and definition could address differences between the meaning of base transfers for the CAISO BAA and for other WEIM areas.</p> <p>PG&amp;E requests clarification of two issues regarding the proposed credit for Regulation Up.</p> <p>PG&amp;E would appreciate additional review and explanation of the highlighted tariff language. PG&amp;E's reading of this section suggests there may be zero "Incremental Energy net of FMM Instructed Imbalance Energy, RTD Instructed Imbalance Energy, and Uninstructed Imbalance Energy excluding non-Participating Load."</p>	<p>PacifiCorp requests clarification on automatic nature of transfer vs. manual opt-in.</p> <p>PacifiCorp requests clarification in tariff to specify BAA may receive revenue allocation even when not opted-in to receive AET product.</p>	<p>Clarification suggested to avoid confusion with EDAM RSE penalty surcharges.</p>	<p>Only BAAs that follow the BPM opt-in process (Master File/Market Notice) will automatically receive a transfer.</p> <p>The terminology on "base transfers" has been revised to "base scheduled transfers" consistent with existing EIM BPM scope of base transfers.</p> <p>With respect to the credit, an EIM Entity's Upward Available Balancing Credit is equivalent to CAISO's Regulation-Up Energy. Including spin/non-spin in CAISO's credit would upset the equivalence.</p> <p>With respect to the pro-rata allocation of revenues, PacifiCorp's requested clarification has been added and the BPM revisions will include clarifying examples as PG&amp;E requested.</p> <p>With respect to CAISO distribution of revenues, the intent is to distribute to SC's that supply assistance energy, measured as those SCs that provide Incremental Energy. CAISO staff determined a backstop was unnecessary, as CAISO supply of AET would not</p>

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						be possible of no SC provided Incremental Energy.
Indicate your organization's support for the proposed changes in draft sections 29.34(l)(3), 29.34(m)(1)(B), and 34.12.4, the proposed implementation of the exclusion of certain LPT exports	Bonneville is concerned about the impact of the change to E-tagging to using the firm-provisional tag.	<p>ED staff supports CAISO's proposed changes to Section 29.34 (l)(3)(B) that exclude the real-time hourly block exports which cleared the HASP.</p> <p>ED staff encourages CAISO to specifically delineate the HASP exports that will not be included in the RSE.</p> <p>ED staff requests that CAISO clarify that real-time hourly block exports which do not clear the HASP (but may have e-tagged nonetheless) are also</p>	PG&E requests clarification on how this tagging language relates to exports associated with stranded load.	<p>PacifiCorp finds these changes to be consistent with the proposed exclusion of HASP cleared LPT in the CAISO's resource sufficiency evaluation.</p> <p>PacifiCorp is concerned about implications of the tagging requirements. A reasonable approach would be to have G-FP1 for DA LPT schedules, G-FP2 and G-FP3 for RT LPT schedules to signal a hierarchy of curtailment. PacifiCorp believes this approach will achieve the CAISO's goal in this initiative to accurately reflect their WEIM RSE obligation while also creating a streamlined approach that will mitigate any potential tagging errors.</p>	Administrative clarifications requested re "protected self-schedules."	<p>LPT exports will be required to follow tagging rules. Specific rules of tagging to be developed in the course of a BPM revision, including consultation with OATI, to minimize impact on neighboring BAAs including BPA and PacifiCorp.</p> <p>The benefit of the exclusion of LPT exports that are eligible for curtailment as provided in 34.12.4(a) and (b) be reflected in the results of the upward capacity and flexibility tests performed for the CAISO BAA. Rather than change the calculation of the upward capacity/flexibility tests, the CAISO will reflect the benefit of the exclusion of the LPT exports curtailable under 34.12.4(a) and (b) as fifteen minute dispatchable resources to achieve the outcome described in the policy paper and approved by the board.</p>

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		excluded from the demand obligation.				
Indicate your organization's support for the proposed changes in draft section 29.34(n)(3), the proposed implementation of the assistance Energy transfer product	No comment.	ED staff does not support CAISO's proposal in Section 29.34(n)(3) to allow the CAISO itself to accept the assistance energy through a market notice process.	No comment.	Tariff clarification requested to ensure that tariff appropriately conveys that this is not a request-based program but is automatic when a BAA has registered to receive such transfers generally and has a capacity or ramp failure.	No comment.	<p>CAISO participation in AET product to be determined based on development of specific criteria through upcoming BPM process. CAISO will only issue a Market Notice after completion of that process and consistent with the agreed-upon criteria.</p> <p>Tariff clarification provided in 29.34(n)(3) to specify the automatic nature of transfer and clarify CAISO obligation to comply with BPM criteria prior to issuing Market Notice.</p>

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Any additional comments on the WEIM Resource Sufficiency Evaluation Phase 2 revised draft tariff language	In Section 34.12.4, the first paragraph states that “CAISO may...apply the market scheduling run priorities ...before the CAISO Balancing Authority Area is in an energy emergency alert.” Bonneville notes that the RSE Second Revised Final Proposal states that curtailment would happen “even before the CAISO BAA is in an energy emergency alert (EEA) 3.” BPA seeks clarity on the correct language and encourages CAISO to maintain the original statement regarding EEA 3.	ED staff strongly supports CAISO’s proposed addition of Section 34.12.4 clarifying that it may curtail lower priority HASP hourly block exports before it is in an energy emergency alert and that it will curtail lower priority HASP hourly block exports in an EEA3 to prevent the need to arm load to meet its operating reserve obligation	N/A	N/A	N/A	Per stakeholder call, no further revision made to EEA3 language.

March 21, 2023 Update

Tariff Section	Revised Text	Explanation	Applicable BPM
§ 29.34(n)(1)(C)	To facilitate procurement of the Flexible Ramping Product within the existing RTUC processes and along the time intervals for RTUC runs set forth in Section 34.3.1 and further explained in the Business Practice Manual for Market Operations, and solely for the purpose of this subsection 29.34(n)(1), the final opportunity for the EIM Entity to revise hourly Real-Time EIM Base Schedules to allow for procurement of the Flexible Ramping Product for the first fifteen-minute interval of each hour will be that provided in Section 29.34(f)(1)(B) and the final opportunity for the EIM Entity to revise hourly Real-Time EIM Base Schedules to allow for procurement of the Flexible Ramping Product for the remaining intervals of each hour will be that provided in Section 29.34(f)(1)(C).	<p>The CAISO procures Flexible Ramp Up (FRU) and Flexible Ramp Down (FRD) for BAAs that pass the sufficiency and capacity tests. If a BAA has failed the sufficiency or capacity tests, FRU/FRD is procured separately, as provided in existing Section 29.34(n)(1) and (2).</p> <p>In implementing FRU/FRD it was determined that the RTUC model must treat the flexible ramping awards and prices from the third fifteen-minute interval in each RTUC process as financially binding, meaning that for that the results of the T-55 RSE evaluation must be used to determine FRP procurement in the first interval of each subsequent hour (<i>e.g.</i>, 11:00-11:15). The results of the T-40 RSE evaluation will be used to determine FRP procurement in the remaining intervals of each hour (<i>e.g.</i>, 11:15-11:59).</p>	<p>The flexible ramping product market design, and the use of the T-55 RSE results to determine FRP procurement in the first interval of the hour, is discussed in Section 7.1.3.1 of the Market Operations Business Practice Manual. The changes are available for review as part of PRR 1473.</p> <p>If further detail, explanation, or illustration is valuable, such additions can be considered in the upcoming EIM BPM revision process to implement RSE Phase 2.</p>
§ 29.34(n)(2)(C)	To facilitate procurement of the Flexible Ramping Product within the existing RTUC processes and along the time intervals for RTUC runs set forth in Section 34.3.1 and further explained in the Business Practice Manual for Market Operations, and solely for the purpose of this subsection 29.34(n)(2), the final opportunity for the EIM Entity to revise hourly Real-Time EIM Base Schedules to allow for procurement of the Flexible Ramping Product for the first fifteen-minute interval of each hour will be that provided in Section 29.34(f)(1)(B) and the final opportunity for	<p>These tariff changes provide clarity on how the RSE results are used for purposes of FRP procurement but do not impact energy awards or other functions of the RSE (<i>e.g.</i> assistance Energy transfers). The CAISO is publishing tariff revisions as part of RSE Phase 2 to ensure entities are provided visibility into how the FRU/FRD processes utilize the results of the RSE tests to determine FRP awards and prices.</p>	

the EIM Entity to revise hourly Real-Time EIM Base Schedules to allow for procurement of the Flexible Ramping Product for the remaining intervals of each hour will be that provided in Section 29.34(f)(1)(C).