

June 12, 2025

CAISO Board of Governors, Western Energy Markets Governing Body

Subject: Extended Day-ahead Market Congestion Revenue Allocation

Dear Board of Governors and Governing Body Members:

Idaho Power appreciates the opportunity to provide comments to the CAISO Board of Governors and the Western Energy Market Governing Body in support of the Final Proposal for the EDAM Congestion Revenue Allocation initiative. Idaho Power would like to express our appreciation to the CAISO staff for recognizing, acknowledging and quickly moving to adopt a transitional change to EDAM congestion allocation, which we recognize is a complex issue.

Idaho Power supports the first phase as outlined in the final proposal and appreciates CAISO's commitment to near-term and long-term enhancements. These enhancements will be extremely important especially for customers with firm OATT transmission rights who want EDAM to economically dispatch their supply to also receive a congestion hedge similar to those that elect to self-schedule. We believe further discussion in the next phases must occur around how to eliminate any possible "use it or lose it" incentive in the congestion allocation design which impacts the market efficiency. We appreciate the CAISO staff and stakeholders all coming together to look for a market design that is fair and equitable and look forward to the next phase as we move to a non-transitional long-term solution to this complex issue.

Sincerely,

Kathy Anderson

Senior Manager, Transmission and Markets