

Stakeholder Comments

Energy Imbalance Market Entity Readiness Criteria, Stakeholder Call, May 13, 2015

Submitted by	Company	Date Submitted
Lisa Olson eolson@semprautilities.com 858-650-6182	San Diego Gas & Electric	May 21, 2015

SDG&E appreciates the opportunity to comment on the Energy Imbalance Market (EIM) Readiness Criteria as outlined by the CAISO on May 6th and presented to stakeholders on May 13th. The criteria creation was directed by FERC to ensure new EIM entrants have prepared systems and processes to sync to the EIM market prior to participation. SDG&E believes the criteria is well thought out and achieves FERC goals except for the proposed Market Simulation criteria. SDG&E would like to see CAISO detail out a more thorough Market Simulation plan. We do not believe the current plan contains enough detail, nor testing requirements, to prove a new EIM market participant is ready for EIM market entrance and full participation from timely bid creation and submission to settlement processing.

SDG&E would like to see the Market Simulation readiness criteria include a true parallel (with outages) 'Bid-to-Bill' process such that participants have the requirement to test that their systems can submit bids, see awards, and download and process settlements statements from these simulation market runs. The first implementation of EIM introduced a significant amount of billing determinants to settlement statements. Market participants didn't have a sense of this until receiving the settlement statements from the bid- to-bill test cases. This is an important readiness validation step.