

## Attachment A

### Stakeholder Process: Enhancements for summer 2021 readiness

## Summary of Submitted Comments

Stakeholders submitted four rounds of written comments to the ISO on the following dates:

- January 14, 2021
- January 20, 2021
- February 3, 2021
- March 3, 2021

Stakeholder comments are posted at: <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Market-enhancements-for-summer-2021-readiness>

Other stakeholder efforts include:

- Project launch (Call): January 6, 2021
- Workshop (Call): January 13, 2021
- Straw proposal (Call): January 27, 2021
- MSC meeting (Call): February 11, 2021
- Draft final proposal (Call): February 22, 2021
- Draft tariff language (Call): February 26, 2021
- Draft final proposal (Call): March 3, 2021

Market Participant	Response	<b>Comments on proposed enhancements to:</b> <ul style="list-style-type: none"> <li>• Include net load uncertainty in resource sufficiency evaluation's capacity test</li> <li>• Require "auto mirroring"</li> </ul>	Management response
Bonneville Power Authority	Supports with Caveats	<p>Supports adding the net load uncertainty requirement to the capacity as an incremental improvement to the resource sufficiency evaluation.</p> <p>Requests additional analysis to determine if proposed changes resolve the potential for a balancing authority area (BAA) to inappropriately pass the resource sufficiency evaluation during emergency conditions.</p>	<p>Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021.</p> <p>Management plans to complete additional analysis of resource sufficiency evaluation performance in conjunction with the upcoming initiative. This analysis will be used to guide any additional design modifications.</p>
California Public Utilities Commission	Supports with caveats	<p>Supports proposed changes to require "auto mirroring" but does not support the inclusion of uncertainty within the capacity test.</p> <p>Supports a comprehensive stakeholder initiative to enhance the resource sufficiency evaluation to examine physical and financial consequences for resource sufficiency failure as well as develop EIM level oversight of BAA performance. Believes this is the appropriate proceeding in which to address the inclusion of uncertainty within the bid range test.</p>	<p>Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021. .</p>
EIM Body of State Regulators	Supports	<p>Supports adding net load uncertainty to capacity test and a comprehensive stakeholder initiative to enhance the resource sufficiency evaluation to examine physical and financial consequences for resource sufficiency failure as well as develop EIM level oversight of BAA performance.</p>	<p>Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021</p>

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California ISO Department of Market Monitoring	Supports	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation.  Supports change to require auto-mirroring.	No Comment
Joint EIM Entities	No Position	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation. Concerned that the proposed change does not ensure the resource sufficiency evaluation will fully prevent leaning. Believes additional changes should be implemented by summer 2021.	Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021. .  Management plans to complete additional analysis of resource sufficiency evaluation performance in conjunction with the upcoming initiative. This analysis will be used to guide any additional design modifications.
Pacific Gas and Electric	Opposes with caveats	Does not believe that adding uncertainty to the capacity test should be a priority for the ISO prior to summer 2021. Express concerns that adding this requirement will lead to additional failures during tight supply conditions, which creates potential reliability risk.  Supports change to require auto-mirroring.	Management believes its proposal to add the net load uncertainty requirement to the capacity test provides a reasonable improvement to the test. Management also believes the proposed enhancements are implementable prior to summer 2021 without compromising other priorities.
PacifiCorp	Supports with caveats	Supports all proposed changes as incremental improvements to the resource sufficiency evaluation. Believes it is important to take the time to determine if additional enhancements are appropriate.	Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021.

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Public Generating Pool	Supports	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation. Supports an additional stakeholder process to pursue additional enhancements.	<p>Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021.</p> <p>Management plans for analysis identifying the expected accuracy of the resource sufficiency evaluation, following the proposed incremental improvements in this policy, to be completed prior to the upcoming initiative. This analysis will be leverage to guide any additional design modifications that may be necessary.</p>
Public Power Council	Supports with caveats	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation. Supports an additional stakeholder process to pursue additional enhancements.	No comment
Salt River Project	Supports with caveats	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation. .	Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021.
San Diego Gas & Electric	Supports	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation. Believes the change should be tested prior to implementation.	No Comment

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Seattle City Light	Supports with caveats	Supports an additional stakeholder process to pursue additional enhancements.	Management is planning for a comprehensive stakeholder initiative examining the resource sufficiency evaluation beginning in April 2021.
Shell Energy	Supports	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation.	As above
Six Cities	Supports	Supports adding the net load uncertainty requirement to the capacity test as an incremental improvement to the resource sufficiency evaluation.	As above
Southern California Edison	Supports	No comment on adding net load uncertainty requirement to the capacity test but supports taking more time to comprehensively examine potential additional resource sufficiency evaluation enhancements.	As above

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Vistra	No Position	<p>Supports the proposed changes to "auto mirroring" as incremental improvements to the resource sufficiency evaluation.</p> <p>Has concerns regarding uncertainty being added to the capacity test. Requests the ISO consider adding uncertainty between the day ahead and real time markets, rather than the proposes uncertainty between the real time pre-dispatch and real time dispatch.</p>	<p>Management believes that uncertainty between the day ahead and real time markets is best addressed through the expanded day ahead market initiative.</p>