

March 17, 2026

Submitted by Bonnie Blair on Behalf of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California ("Six Cities")

### **INITIAL COMMENTS/QUESTIONS ON PRR 1662 CHARGE CODES**

Charge Code 8071: Re Bus Req ID 3.2 (p. 6), fourth line, should "undelivered" be "unavailable"?

Charge Code 8081: Re Bus Req ID 3.2 (p. 6), second line, should "IRU" be "IRD"?

Charge Code 8088: For clarity and consistency, the Six Cities recommend the following edits - -

In the title for the Charge Code BPM, insert "Revenue" after "Surcharge".

In Bus Req ID 2.0, change "surcharges" to "surcharge revenues".

In Bus Req ID 2.2, change "surcharges" to "surcharge revenues".

In Bus Req ID 4.0, in the fourth line of each paragraph, change "BAA" to "BAAs".

In Bus Req ID 4.1 - - in the first line change "BAA" to "BAAs". In the last line, change "IRU, RCU, and transfer of BAA" to read "IRU transfer, and RCU transfer".

In Bus Req ID 4.2 - - in the first line change "BAA" to "BAAs". In the last line, change "IRD, RCD, and transfer of BAA" to read "IRD transfer, and RCD transfer".

Charge Code 8315: Several sections of the Charge Code appear to be inconsistent. Section 2.1, last paragraph, and Section 2.2, second sentence, indicate that charges or payments under the Greenhouse Gas Offset may be made to GHG Regulation Area or non-GHG Regulation Area metered demand (Section 2.1) or to the EDAM Entity Scheduling Coordination for the GHG Regulation Area or non-GHG Regulation Area (Section 2.2). However, Bus Req ID 5.0 states that the Greenhouse Gas Offset is allocated to the GHG regulation area's metered demand. Please clarify.

Charge Code 8404: In Section 2.1, the first paragraph at the top of page 4, the second sentence states, "The System Marginal Energy Cost (SMEC) is the same for all nodes in the network." It is the Six Cities' understanding that under the EDAM design, participating BAAs may have different SMECs if there is price separation from other BAAs. Please clarify.

Charge Code 8704: Section 2.1 of this Charge Code appears to be outdated, with unnecessary references to MRTU revisions and repetition of the inaccurate statement that "The System Marginal Energy Cost (SMEC) is the same for all nodes in the network." In addition, the Charge Code appears to be internally inconsistent. Section 2.2 states that this Charge Code applies only to Scheduling Coordinators for non-CISO Balancing Authority Areas, but Section 2.1 and Bus Req ID 1.1 refer to several market features (e.g., Ancillary Services, Convergence Bidding, and CRRs) that are relevant only for the CISO BAA. The Six Cities recommend comprehensive review and revision of this Charge Code to eliminate outdated, inapplicable, and inconsistent references.

Charge Code 8800: A number of the elements of this Charge Code (e.g., reference to CAISO Forecast of CAISO Demand in Section 2.1, reference to RCU Overlapping RA Capacity Amount

in Bus Req ID 5.1) suggest that it applies only to the CISO BAA, but that is not expressly stated. The Six Cities request that the CAISO clarify whether this Charge Code applies only in the CISO BAA. If the Charge Code will apply to EDAM Entity BAAs, the Six Cities recommend consideration of revisions to be consistent with that broader application.

In addition, the Six Cities have a question regarding the last sentence of the Description in Charge Code 8800. The statement, "For RA resources the RUC award MW quantity does not include the RA capacity that is not eligible for RUC payments" appears to be copied over from the old RUC Charge Code 6800 Description. Does this still apply, since RA capacity will now be eligible for RUC payments?

Charge Code 8806: The Six Cities recommend correcting Section 2.1 as follows - -

In the second line of the first paragraph, change "CAISO Demand" to "BAA Demand".

In the second paragraph, strike everything after the first sentence (*i.e.*, eliminate references to a requirement for RA resources to submit \$0 bids for RCU). Insert "Resource Adequacy Resources have a Must Offer Obligation for RCU, are optional for RCD and can bid non-zero prices for RCU/RCD." [NOTE: Copied from Charge Code 8810].

Charge Code 8807: The Six Cities recommend correcting Section 2.1 as follows - -

In the second line of the first paragraph, change "CAISO Demand" to "BAA Demand".

In the second paragraph, strike everything after the first sentence (*i.e.*, eliminate references to a requirement for RA resources to submit \$0 bids for RCU). Insert "Resource Adequacy Resources have a Must Offer Obligation for RCU, are optional for RCD and can bid non-zero prices for RCU/RCD." [NOTE: Copied from Charge Code 8810].

Charge Code 8810: A number of the elements of this Charge Code (*e.g.*, reference to CAISO Forecast of CAISO Demand in Section 2.1, reference to RCD Overlapping RA Capacity Amount in Bus Req ID 5.1) suggest that it applies only to the CISO BAA, but that is not expressly stated. The Six Cities request that the CAISO clarify whether this Charge Code applies only in the CISO BAA. If the Charge Code will apply to EDAM Entity BAAs, the Six Cities recommend consideration of revisions to be consistent with that broader application.

In addition, the Six Cities have a question regarding the last sentence of the Description in Charge Code 8810. The statement, "For RA resources the RCD award MW quantity does not include the RA capacity that is not eligible for RCD payments" appears to be erroneous, since RA capacity will be eligible for RCD payments.

Charge Code 8816: The Six Cities recommend correcting Section 2.1 as follows - -

In the second line of the first paragraph, change "CAISO Demand" to "BAA Demand".

In the second paragraph, strike everything after the first sentence (*i.e.*, eliminate references to a requirement for RA resources to submit \$0 bids for RCD). Insert "Resource Adequacy Resources have a Must Offer Obligation for RCU, are optional for RCD and can bid non-zero prices for RCU/RCD." [NOTE: Copied from Charge Code 8810].

Charge Code 8817: The Six Cities recommend correcting Section 2.1 as follows - -

In the second line of the first paragraph, change “CAISO Demand” to “BAA Demand”.

In the second paragraph, strike everything after the first sentence (*i.e.*, eliminate references to a requirement for RA resources to submit \$0 bids for RCD). Insert “Resource Adequacy Resources have a Must Offer Obligation for RCU, are optional for RCD and can bid non-zero prices for RCU/RCD.” [NOTE: Copied from Charge Code 8810.

Pre-Calc for Day-Ahead Congestion: Because the EDAM Tariff definition of the Marginal Cost of Congestion includes congestion relating to Reliability Capacity, the Six Cities question why there is no reference to RCU/RCD in this Pre-Calculation. Please clarify.