



Cathleen Colbert

Senior Director, Western Markets Policy

325 7th Street NW, Suite 520

Washington, DC 20004

Telephone: (412) 720-7016

Email: cathleen.colbert@vistracorp.com

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California Independent System Operator

BPM Change Management Team

250 Outcropping Way

Folsom, CA 95630

SUBJECT: Proposed Revision Request 1662

Vistra requests CAISO make targeted clarifications regarding EDAM-DAME Settlement Configuration Guides. The following represents a narrow review of these configuration guides. Vistra requests additional time to continue reviewing and submitting comments. Our hope would be for revised BPM drafts to be published given the review cycles completed and allow an additional round for more detailed review.

Configuration Guide Charge Code 66700, Charge Code 6011, PC DA Congestion, and Business Practice Manual for Congestion Revenue Rights Appendix J, Charge Code 6790,

CAISO should add more clarity identifying where the approved parallel-flow congestion revenue allocation changes are being implemented in the settlement configuration guides. Vistra requests the CAISO revise the charge codes associated with CRRs to make it clearer the impact of the EDAM Congestion Revenue Allocation changes.

Vistra requests clarifications to increase clarity regarding the implementation of Tariff Section 11.2.4.1.2 that will now exclude from “portion of the IFM Congestion Charge in that Settlement Period attributable to congestion on the Transmission Constraint to which the Hourly CRR Congestion Fund corresponds” the “congestion difference allocation to an EDAM Entity Balancing Authority Area as specified in Section 33.11.1.2.1”.

First, it would be helpful to add to CC 6700 an explicit note that CAISO Hourly IFM Congestion Charge is calculated in PC DA Congestion to avoid confusion when someone attempts to find the legacy calculation that has been struck and to strike the last sentence of Section 2.2 Description that still states that the hourly CAISO congestion charge is calculated within CC 6700.

Second, Charge Code 6790 CRR Balancing Account_6.0 refers to the PC Day Ahead Congestion as the pre-calculation for Hourly IFM Congestion Charges, however it would help to add to the background

or description that Hourly CAISO Congestion Charges, also called Hourly IFM Congestion Charges are calculated in the PC DA Congestion.

Third, in the PC DA Congestion the business rule 5.0 does not specify the congestion allocated to EDAM Entity BAA is removed from the IFM Congestion Charge in writing, and it is unclear in the formula which input is for the IFM Congestion the EDAM allocated congestion charges or which formula is removing those allocated congestion amounts from the CAISO Hourly IFM Congestion Charge. In Charge Code 6011, it appears this is the predecessor CC to calculate the EDAM Entity BAA congestion difference allocation amount, but it would be easier to find the underlying OATT contract congestion amount and understand how it is an input to PC DA Congestion if description explained that the CC 6011 is a pre-calc that includes calculating the EDAM entity congestion allocation amounts for use in the Hourly IFM Congestion Charge calculation. The value that CC 6011 calculates capturing the OATT contract congestion $BA_{HourlyDAEnergyTotalOATTContractsCongestionCreditAmount}$ is not mentioned in PC DA Congestion, but this is stated to be the new home for calculating Hourly IFM Congestion Charge. Greater clarity on how the new Tariff rule for Hourly CRR Congestion Charges is still needed.

Visra requests clarifications in CC 6011, CC 6700, CC 6790, and PC DA Congestion so that the movement of calculating the Hourly IFM Congestion Charge can be followed and so that the new settlement rule in Section 33.11.1.2.1 is more clearly described in the PC DA Congestion so it is clearer that congestion allocated to EDAM Entity BAA is removed from the CAISOHourlyIFMCongestionCharge.

Finally, Visra respectfully request that the CAISO updated Congestion Revenue Rights BPM Appendix J include a description of the new rule in Tariff Section 11.2.4.1.2, and an example of Partial Funding. It will be very important the new process for removing the EDAM Congestion “congestion difference allocation to an EDAM Entity Balancing Authority Area as specified in Section 33.11.1.2.1” from the hourly congestion revenues attributable to congestion on Transmission Constraint is described clearly so that CRR holders may understand the updated partial funding calculation due to the Tariff Section 11.2.4.1.2. Visra further requests that the CRR BPM be updated to include that Imbalance Reserve congestion components are now included in the CRR product, clarify the auction bid should represent both energy congestion and imbalance reserve congestion components, and provide a CRR settlement example with two products’ congestion components.

Configuration Guide Charge Code 6824, BPM - CG CC 6824 No Pay Residual Unit Commitment (RUC) Settlement_5.5, and the Pre-Calculation RUC No Pay Quantity_5.18

Both legacy RUC No Pay guides – CG 6824 and PC No Pay Quantity – have background sections that reflect the old RUC rules prior to the EDAM-DAME Tariff including not allowing RA resources to submit RUC availability bids. CG 6824 and PC No Pay Quantity also omit reference to the new RUC products (RCU, RCD). Please revise to align with the background added due to the DAME-EDAM initiatives in a manner similar to that taken in Charge Code 8800 and in PC RUC_Net_Amount. Visra further suggests the CAISO review the RUC related guides again to make sure the new RUC bidding rules and products are reflected in all RUC related guides to catch any other omissions.

Configuration Guide Charge Code 8071 and Charge Code 8081

Visra requests the CAISO add a high-level summary of the unavailable Imbalance Reserves rescission payment that is performed within these charge codes in the background and the description sections given its importance. Further, the business rules in the applicable charge codes for Imbalance Reserve

Settlement regarding the unavailability of Imbalance Reserves reflect two different requirements and should be clarified.

Business Rule 3.0 state that unavailable IR is determined based on by which the resource's Day-Ahead Schedule for Supply plus Ancillary Services Awards other than for Regulation Down plus the IRU award minus the Five-Minute Imbalance Reserve Quantity exceeds the resource's Upper Economic Limit as adjusted by applicable Outages in the FMM for IRU and by which the resource's Lower Economic Limit as adjusted by applicable Outages in the FMM exceeds the resource's Day-Ahead Schedule for Supply minus the Ancillary Services Awards for Regulation Down minus the IRD award plus the Five-Minute Imbalance Reserve Quantity for IRD. In contrast, Rule 3.2 in the applicable charge codes states that the unavailability charge is based on FMM Ex-post capacity range that does not support DA energy schedule plus the IRU award less five minute ramp capable capacity for IRU or on FMM Ex-post capacity range that does not support DA energy schedule minus the difference of the IRU award and five minute ramp capable capacity for IRD. FMM Ex-Post Capacity Range is described in most detail in the Business Requirements Specification, but is not defined in the charge code.

Vistra requests the CAISO defined FMM Ex-Post Capacity Range in a Charge Code documenting the calculation. Vistra also requests the CAISO clarify whether the IRU No-Pay Penalty Price of Max (FMM FRU price, IRU price) is calculated based on Rule 3.0 or 3.2. CAISO should further clarify how 3.0 and 3.2 contemplate each other instead of compete with each other, or if they are duplicating a settlement calculation description to remove the one that is less accurate. Finally, Vistra notes that the Upper Economic Limit or Lower Economic Limit are defined as $P_{max} - \text{Derates} - \text{Upward AS}$ and $P_{min} + \text{Rerates} + \text{Downward AS}$ such that the language in Rule 3.0 "Upper Limit as adjusted by applicable Outages in the FMM" is redundant.

Configuration Guide 7071 and 7081

The configuration guides associated with FRP uncertainty settlement now include ramp deviation settlements between IR and FRP. Vistra requests the CAISO add this addition in a narrative explanation to the summary and description sections of these charge codes.

Configuration Guide Charge Code 8310

The Charge Code description still retains legacy description of GHG modeling prior to EDAM-DAME implementation. The description states, "This LMP component is absent for locations in a GHG Regulation Area because in these cases the cost of GHG compliance is included in the energy bids; hence it is already reflected in the marginal energy component." This is no longer true as under EDAM-DAME, the GHG LMP component is present in a GHG Regulation Area because now the component represents an incremental GHG adder within the GHG Regulation Area. Please review the GHG related configuration guides to make sure the new GHG LMP component descriptions are aligned to EDAM-DAME implementation.

Configuration Guide Pre-Calculation Start-Up and Minimum Load Cost_6.0

Vistra notes risk of some confusion if guides continue to refer to "CAISO-committed resources" or "ISO-committed" going forward when in practice the application is meant to apply to either "EDAM-committed" or "WEIM-committed". We acknowledge CAISO redlined 1.1 and 1.2 in the Business Rules to try to capture this issue. However, the background glosses over the differentiation and this PC also captures real-time operations were mention of WEIM-committed is missing. Vistra suggests conforming the reference to ISO-committed to either "market-committed" or "EDAM-committed" and "WEIM-

committed” depending on the applicable market run that led to the commitment costs. We encourage the CAISO to make a shift across the settlement guides away from CAISO-committed to using a new general syntax.