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**SUBJECT: Proposed Revision Request 1663**

Vistra requests CAISO make targeted clarifications regarding RA requirements under EDAM-DAME. The following represents a narrow review of Reliability Requirements BPM and 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.

**Section 7.1.1 - Storage Generic RCU MOO**

For Non-Generator Resources, the RUC MOO is incorrect as it states NGRs are required to submit both RCU and RCD bids for all RA Capacity. Section 40.6.1 Day-Ahead Availability and Section 40.10.6.1 Day-Ahead and Real-Time Availability specify a Scheduling Coordinator must submit RUC Availability Bids for RCU for their Generic RA and Flexible RA respectively. There was no intent to apply a RCD MOO on storage. Please revise the draft BPM to align storage's RUC MOO with all other resources requiring it to "submit RUC Availability Bids for RCU for the amount of their Resource Adequacy Capacity that is eligible for a RUC Award under Section 31.5.5.3 and is within the Energy Bid range of the Energy Bid Curve."

**Section 7.1.1 - RTM MOO**

Please clarify the RTM must-offer obligations for Generic RA Resources. The draft BPM states:

- Economic Bids or Self-Schedules are to be submitted for any remaining RA Capacity from resources scheduled in IFM or RUC.
- Economic Bids or Self-Schedules are to be submitted for all RA Capacity from Short-Start Units not scheduled in IFM (ISO Tariff 40.6.2).
- No RTM obligation for Long-Start or Extremely Long-Start units if not scheduled in IFM. (ISO Tariff, Section 40.6.2(c&d)).

Clarification is needed to more cleanly capture the new reality that generic RA can convert its obligation from Generic to Flexible through receiving Imbalance Reserves or Reliability Capacity. Our understanding is that in practice, a Generic RA resource may have different RTM MOOs on the portion of its RA MW that received an IR or RC award versus any remaining portions without an IR or RC award.

Please clarify that under EDAM-DAME, any RA capacity remaining after accounting for Energy, Imbalance Reserves, and Reliability Capacity can continue to meet its RTM MOO with economic bids or self-schedules, but any RA capacity associated with Imbalance Reserves or Reliability Capacity awarded range must submit economics bids for that portion of the resource's operating range.

### **Section 7.3.3 - Flexible RCU MOO**

Vistra seeks clarification on the RCU MOO for Generators and Non-Generating Resources. The BPM draft states, "must submit RUC Availability Bids for RCU for their Flexible RA Capacity." However, it is our understanding that RUC will only award up to the RCU certified MW, which is in many cases less than its Effective Flexible Capacity (EFC). For Generating Units, the RCU certified MWs may be less than its Flexible RA Capacity due to Effective Flexible Capacity being tuned to 3 hour ramp movement instead of RCU requirements for 60 minute dispatchable and 60 minute ramp capable movement. For NGRs, the RCU certified MW is limited to the discharge range, which is 50% of its flexible RA capacity for many storage. Vistra seeks clarity on whether RCU MOO is for EFC MW shown or if it is for the lower of the RCU certified MW and the EFC shown recognizing the 60 minute dispatchable criteria or storage's discharge range only criteria in setting the RCU certified MW. Please add BPM detail to clarify the RCU MW associated with the Flexible RA resource.

Further, Vistra understood from the CAISO Tariff revisions that there would be inserted bids for RCU. Section 30.7.3.1 refers to inserting bids for RCU for RA resources as specified in Section 40.6.8. Please explain why the table states no RCU bid insertion given that expectation, and clarify if unintended.

### **General - Generated Bids for IR/RC**

Vistra recommends adding reference to Market Instruments BPM sections on Generated Bids used for IR and RC, which should include the detail on how the Generated Bids are set for RA resources' MOO.