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April 14, 2026

California Independent System Operator

BPM Change Management Team

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SUBJECT: Proposed Revision Request 1667

Vistra requests CAISO make targeted clarifications regarding Market Instruments under EDAM-DAME. The following represents a narrow review of Market Instruments BPM. 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.

RSE Resources RUC Must-Offer Obligations

CAISO should revise PRR 1667 so it expressly states that, in EDAM, RUC qualifying resources that submit IFM bids must also participate in RUC with RCU bids and provides clarity on RCU bid insertion when the resource submits IFM bid but omits to submit RCU bid. Clarifications should consider MSG and NGR specific bid insertion clarifications as well. The BPM should explicitly state that the bid

Section 3.1.2

Please clarify whether resources that bid into IFM that are used to pass the RSE but that do not submit RCU bids will have generated RCU bids into RUC. Please add the detail in the BPM regarding application of generating bids consistent with Section 30.5.2.8 and Section 30.7.3.1 (ER26-1294).

The clarifications should also distinguish between California RA resources and non-RA resources generated bids. In these clarifications, the CAISO should be clear whether the RCU generated bids for resources that offered economic energy into IFM is at a quantity no less than its economic bid or no less than the lower of its economic bid or RCU certified MW. For RA resources, the generated bid explanation should specify whether the RA MOO or the bid insertion for resources' offering economic bids sets the MW value for RCU bid insertion for California RA resources.

For resources that economically bid into IFM that do not submit a RCU bid, please add clarity that the CAISO will insert generated RCU bids at resources' existing Default Availability Bids consistent with Tariff Section 30.7.3.1. For RA resources, please add clarity whether its generated bids are at the Default Availability Bids also or at \$0/MWh.

Section 5.1.1.3

Clarification requested on whether the rules associated with MSGs meeting RA MOO in RUC also apply to MSGs that are non-RA that submitted economic bids in IFM used to meet the RSE requirements with the RCU MOO. If not, add clarification on how they differ.

Real-Time Must-Offer Obligation out of IR or RUC Require Flexible MOO

EDAM-DAME Tariff is clear that the RTM MOO created by IRU/IRD and RCU/RCD awards result in obligations to submit economic energy bids covering the award range, not merely self-schedules. The draft BPM language refers to the RTM MOO but omits RTM flexible MOO (or RTM economic MOO).

Sections 2.3.3, 3.3, and 7.1, and Page 485

Clarification requested that any RCU and RCD awards result in a flexible must-offer obligation into real-time market requiring an economic offer for the portion of the operating range associated with the RCU or RCD award. RTM self-schedules will not meet the RTM MOO.

Section 8.1

Vistra suggests adding the same clarification that an IR award (IRU/IRD) creates a must-offer obligation in the RTM to submit economic bids into the RTM where a RTM self-schedule will not meet that MOO.

RUC Eligibilities

Appendix B.2.2

The CERT_RUC definition needs to be revised to allow NGR to be certified for RUC. In the BRS, the CAISO stated this would be effective at Go Live. The draft BPMs should reflect the effectiveness as of Go Live and be updated. The CERT_*_MW fields definitions should be revised to clarify that for NGR resources only the discharge range is certified for IRU and RCU and only the charging range is certified for IRD and RCD.

This section should also include clarity in the definitions for the certified MW for IRU, IRD, RCU, and RCD for MSGs specifying that the certified values are calculated by MSG configuration given feasible starts, start-up times, or notification times. The Resource tab values for MSGs at a plant level will not equal the MSG configuration values that will be used in the market.

Appendix B.2.11 and B.2.13

Request Master File MSG tables be updated to reflect the MSG configuration certified MW calculated that are in use in SIBR and transmitted to Market Applications. Respecting that the functionality is not present in the GRDT at this time, Vistra recommends the clarity on the MSG configuration level calculation being used for MSGs be added in a narrative in these Appendices until fields can be created in future enhancements. At this time, clarity on the implementation in the BPM is higher priority than the Master File MSG Config fields for Certified MW.

RUC Priorities

Section 7.1

Vistra is seeking clarity on at what price or penalty price the proxy RCU bids inserted for LPT or economic exports into RUC will be set. For a LPT export that cleared based on a self-schedule in IFM, please clarify whether the LPT priority will be modeled in RUC based on a RCU self-schedule at a lower priority level, or if the CAISO will model the proxy RCU as economic bids. Please add this information to the draft BPM.

Default Availability Bids

B.2.1 RESOURCE tab – Modifiable Data

The Market Instruments BPM should define what a Default Availability Bid is, the calculated values, and the option for negotiated DABs in the future. Appendix D is for the Default Energy Bid and includes explanation regarding the negotiated option. An appendix should be added for the Default Availability Bids for IRU, IRD, RCU, and RCD and should describe the DAB values under the calculated option as well as include a sub-section for negotiated option with the detail that the functionality is deferred until a future date. The core content missing is: what a Default Availability Bid is, how it differs from a Default Energy Bid, and how a later Negotiated Availability Bid option would work.