

**Comments of Powerex Corp. on
EIM Base Schedule Submittal Deadline
Issue Paper and Straw Proposal**

Submitted by	Company	Date Submitted
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Powerex is supportive of moving the EIM base schedule timelines closer to the operating hour and providing EIM Entities with additional time to provide more accurate base schedules. However, Powerex believes that the potential benefits of such a change may be limited unless CAISO shifts a number of related EIM timelines closer to the operating interval by a corresponding amount, including the T-55 base schedule submission deadline and the timelines for finalizing inputs used for the EIM Resource Sufficiency tests.

For example, most EIM Entities have decided to apply a deadline of T-57 for interchange base schedules (*i.e.*, just prior to the CAISO's T-55 deadline). If this deadline remains unchanged, then extending the timeline for final base schedule submissions from T-40 to T-30 would not serve the objective of ensuring that EIM Entities are able to more accurately reflect import or export transactions made after T-57. At best, the extra time could be used to partially reflect these transactions by revising the base schedule of any non-participating resources that are used to support the import or export; this, however, would result in the undesirable consequence of leaving the EIM Entity's resource plan unbalanced against the (obsolete) interchange base schedule and, thus, potentially exposing the EIM Entity to over/under scheduling penalties.

Powerex also believes that modifying the base schedule deadline requires a thorough review of the timelines associated with each of the inputs used in the EIM Resource Sufficiency tests. For example, simply moving the final EIM Flexible Ramping Sufficiency Test (FRST) to T-30 could make it more difficult for an EIM Entity to pass by introducing a greater lag between the interchange used for base schedule submissions and the interchange used in assessing resource sufficiency at T-30. Similarly, the potential benefits of the extra time afforded to EIM Entities to revise base schedules may not be realized if EIM Entities seek to avoid such updates in order to ensure their base schedules continue to match outdated load and VER forecasts used in the EIM Resource Sufficiency tests.

For these reasons, Powerex recommends that CAISO update the proposal to shift the T-55 base schedule deadline to T-45, and to include a more detailed description of the proposed timelines for each input of the EIM Resource Sufficiency tests.