

**Comments of Powerex Corp. on
EIM Base Schedule Submittal Deadline
Draft Final Straw Proposal**

Submitted by	Company	Date Submitted
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Powerex is generally supportive of the concept 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. Powerex also appreciates CAISO's revision to its proposal, implementing an advisory Resource Sufficiency Evaluation (RSE) at T-40 and using the same test inputs for the binding RSE at T-30.

While Powerex recognizes that this timeline change provides EIM Entities more time to resolve imbalances, it also increases the time lag between the typical T-57 interchange deadline, applied by most EIM Entities, and the final T-30 submission. If the T-57 timeline is unchanged, this increased time lag will only serve to increase the deviations between the interchange base schedule and the current tagged interchange value at the time of the final base schedule deadline (T-30).

Without a means to update the interchange base schedules, the extra time afforded to EIM Entities could not be used to reflect new imports or exports submitted after T-57. The EIM Entity could only partially reflect these transactions by revising the base schedule of any non-participating resources that are used to support the import or export. Powerex appreciates that these revisions may have the potential to reduce uninstructed imbalance energy settlements. However, this would result in the undesirable consequence of leaving the EIM Entity's resource plan unbalanced against the (obsolete) interchange base schedule thus potentially exposing the EIM Entity to over/under scheduling penalties and Resource Sufficiency test failures.

For this reason, Powerex continues to believe that the potential benefits of the T-30 proposal would be more broadly applicable if CAISO shifted the T-55 base schedule submission deadline by a corresponding amount. Powerex appreciates CAISO's consideration of whether this change could be feasible in the future.