EDAM Congestion Charge Allocation Design Impacts.

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Market Surveillance Committee Meeting

March 6, 2026

PacifiCorp Congestion Charges

The table below summarizes conceptual differences in the settlement of congestion charges on Pac East to Pac West transactions across Western EIM base schedules, the original EDAM design, and EDAM schedules supported by self-scheduled point to point or network service under the go live EDAM design.

	Western EIM Base Schedule	Original EDAM Schedule	Go Live Edam Self-Schedule
Prevailing Charges	not paid by PAC	paid by PAC	Not paid by PAC
Counterflow Charges	not paid to PAC	paid to PAC	Paid to PAC

Congestion charge settlements on PacifiCorp East to PacifiCorp West schedules under the three designs will be different depending on the magnitude of the prevailing and counterflow charges.

PacifiCorp Congestion Charges

The quarterly data on internal congestion charges published by the California Department of Market Monitoring provided some insight into these settlements as discussed in the MSC opinion.[1]

- However, the quarterly data net prevailing and counterflow charges across the months within a quarter and over the hours within each day.

- This netting can cause quarterly congestion data to understate settlement differences under the three congestion settlement designs.

- 1. James Bushnell, Scott Harvey and Benjamin Hobbs, Opinion on Extended Day-Ahead Market Congestion Revenue Allocation, June 16, 2025 pp.19-21.

PacifiCorp Congestion Charges

The CAISO data in Table 17 for average hourly congestion charges in June 2024 on a PAC East ELAP to Pac West ELAP self-scheduled transaction with positive and negative hours summed separately shows: [1]

	Historical	Western EIM Base Schedule	Original EDAM Schedule	Go Live Edam Schedule
(All data is for 1 MW flowing over all 24 hours of an average day during January 2024)				
Prevailing	$7.824	0	$7.824	0
Counterflow	-$17.301	0	-$17.301	-$17.301
Total Net	-$.9.477	0	-$9.477	-$17.301

The data in table 17 is for all internal constraints, not just internal CAISO constraints. The data indicates that PacifiCorp would have received payments for PacifiCorp East to West self-schedules schedules under both the original and go live EDAM design, but not for Western EIM base schedules.

1. All figures are totals for a 1MW an hour flow over an average June 2024 day (24MW/day total). California ISO, Market Performance and Advanced Analytics, Congestion Revenue Allocation, Stage 1 of Analysis, December 2025, Table 17, p. 19. To reduce data entry errors the CAISO provided the MSC with an electronic version of the data in Table 17 so there may be some tiny differences between the data above and Table 17 due to rounding.

PacifiCorp Congestion Charges

The CAISO data in Table 17 for average hourly congestion charges in January 2025 on a PAC East ELAP to Pac West ELAP self-scheduled transaction with positive and negative hours summed separately shows: [1]

	Historical	Western EIM Base Schedule	Original EDAM Schedule	Go Live Edam Self-Schedule
(All data is for 1 MW flowing over all 24 hours of an average day during January 2025)				
Prevailing	$36.874	0	$36.874	0
Counterflow	-$.411	0	-$.411	-$.411
Total Net	$36.464	0	$36.464	-$.411

The data in table 17 is for all internal constraints, not just internal CAISO constraints. The data indicates that PacifiCorp would have paid much smaller congestion charges on PacifiCorp East to West schedules under the go live EDAM design than the Original EDAM design. The Go Live design congestion charges would have been very similar to those for WEIM base schedules.

1.   All figures are totals for a 1MW an hour flow over an average January 2025 day (24MW/day total). California ISO, Market Performance and Advanced Analytics, Congestion Revenue Allocation, Stage 1 of Analysis, December 2025. Table 17 p 19. Data above are also based on an electronic file.

PacifiCorp Congestion Charges

The CAISO data in Table 17 for average hourly congestion charges in July 2025 on a PAC East ELAP to Pac West ELAP self-scheduled transaction with positive and negative hours summed separately shows: [1]

	Historical	Western EIM Base Schedule	Original EDAM Schedule	Go Live Edam Schedule
(All data is for 1 MW flowing over all 24 hours of an average day during July 2025)				
Prevailing	3.305	0	3.305	0
Counterflow	-8.835	0	-8.635	-8.635
Total Net	-5.327	0	-5.327	-8.635

The data in Table 17 is for all internal constraints, not just internal CAISO constraints. The data indicates that Pacificorp would have received somewhat larger payments under the Go Live EDAM design than the original EDAM design and larger than for WEIM base schedules.

1.   All figures are totals for a 1MW an hour flow over an average July 2025 day (24MW/day total). California ISO, Market Performance and Advanced Analytics, Congestion Revenue Allocation, Stage 1 of Analysis, December 2025, Table 17 p. 19. Data above are also based on an electronic file.

PacifiCorp Congestion Charges

Congestion was on average south to north during every hour of the day in January through April 2024, September to December 2024 and February 2025.

- Pac East to Pac West schedules would have been prevailing flows for South to North Congestion.

- Hence, there would have been no difference between the actual WEIM settlements and settlements based on the go-live EDAM design during these months.

In practice, there might have been variations in the direction of congestion over the days of the month with some hours on some days having north to south congestion that perhaps could have been foreseen with self-schedules. Nevertheless we expect that settlements would have been very similar between WEIM base schedules and the go live EDAM design during these months.

PacifiCorp Congestion Charges

The data in the California ISO report leaves the magnitude of the impact of the go live EDAM congestion charge allocation design on PacifiCorp congestion charges somewhat unclear because it is our understanding that the data includes congestion charges on all constraints, including internal Pacificorp constraints.

- We have used the PAC East ELAP congestion component from Table 17 for this Tabulation, rather than the DGAP congestion component from Table 18, because the ELAP congestion component should include less internal PAC East congestion then the DGAP congestion component.