Analyzing the effects of market proliferation in the West on California gas dispatch

November 2023







Project team and Advisors

Project team

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- Ari Eisenstadt and Alexis Sutterman, California Environmental Justice Alliance
- Shana Lazerow, Communities for a Better Environment
- Mark Specht, Union of Concerned Scientists
- Sarah Xu, Brightline Defense

Disclaimer: The views contained in this report do not represent the views of any of the advisors or their organizations



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Context and Purpose

Context

Environmental Justice groups are concerned that California joining an expanded Western RTO could mean additional dispatch of gas plants in California, especially gas plants in disadvantaged communities.

Purpose

The purpose of this study is to explore the potential impacts energy market regionalization may have on the dispatch and resulting emissions from California thermal units, with a focus on combined cycle and combustion turbine gas generators

 Of particular interest is the impact of market regionalization on emissions from generating units located in or near disadvantaged communities (DACs)



Approach

- A series of nodal production cost simulation models that emulate system operations under varying market structures and footprints in the 2032 time-frame were conducted
- The models reflected forecasts for generation expansion, new transmission, and load growth across WECC, with special attention to such forecasts within California
- Changes to generation dispatch and emissions from thermal units in California under each market scenario were recorded and compared to existing market structures to inform the studies findings
- The study used the GridView[™] security-constrained economic dispatch modeling tool, leveraging market models recently developed by Energy Strategies as a part of the State-led Market Study completed in 2021

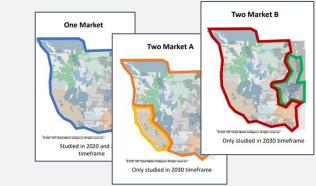


Estimate change in generation & emissions for the California gas fleet, in aggregate and within DACs, assuming a range of West-wide market outcomes

BAU (Status Quo)



Market Scenarios (six cases)



Change in Emissions



Comparison of BAU versus scenarios used to calculate change in emissions for California gas fleet ✓ CO₂ ✓ SO_X ✓ NO_x



Modeling performed for a **2032 study year** using models, sourced from WECC, updated to reflect resource plans, transmission expansion, and public policy requirements for that horizon



- Modeling performed as a part of this study indicates that the proliferation of day-ahead (DA) energy markets in the West could result in *slight decreases* in aggregate California thermal generation
- When California is included as part of a new, larger regional transmission organization (RTO) market footprint, modeling results indicate a significant decrease in aggregate California thermal generation
 - However, when California is assumed to operate a separate and stand-alone RTO, with the rest of the west operating in a parallel RTO market, reductions in generation within California were less significant
- Similar trends were observed for gas units located in disadvantaged communities (DACs) in California:
 - Day-ahead markets caused *slight* reductions in fleet dispatch within DACs

- While we see total overall reductions in emissions and generation in the California gas fleet as a result of DA markets, some DACs experience increases in generation/emissions and other DACs experience decreases, so local impacts to the gas fleet tend to vary
- This local variance is due to the prevailing cost of energy (LMPs), fuel prices, and transmission congestion that result from market changes
- With a few exceptions, RTOs caused significant reductions in fleet dispatch within DACs
- Three DACs (in Modesto, Antioch, and Burbank) saw increases in generation and emissions under RTO market scenarios
- RTOs cause generation & emissions to decline across DACs, in aggregate
- Roughly half of California thermal generators are located in DACs, suggesting that decisions regarding which market and market footprint to join can impact DACs significantly



Methodology & Assumptions

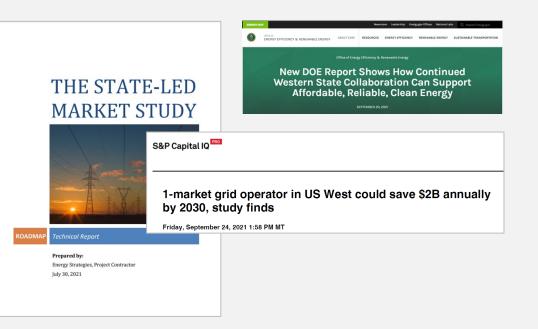




- Energy Strategies performed nodal market simulations using the GridView[™] security-constrained economic dispatch modeling tool, leveraging market models recently developed by Energy Strategies as a part of the State-led Market Study completed in 2021.
 - The market scenarios and footprints analyzed in the State-led Market Study were leveraged in this analysis
 - Additional documentation regarding modeling approaches adopted for the State-led study are available on Energy Strategies' website <u>here</u>
- The following updates were made to the State-led Market Study models:
 - California load and resource mix were updated to reflect the high electrification assumptions from CAISO's 2022-23 Transmission Planning Process
 - Western coal plant retirement timelines were updated
 - Emission rates for thermal units in California were updated to values obtained from CPUC
 - LADWP's plans to convert select units to hydrogen or hydrogen blends by 2032

GridView

is a powerful and user-friendly software tool for integrated engineering and economic analysis of the electric power grid.



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GridL^{*}B STRATEGIES Market Constructs and Footprints Studied

Three market constructs were applied to four market footprints to develop market scenarios considered in this study.

Energy Imbalance Market (EIM)

- Centrally optimized real-time dispatch; day-ahead unit commitment not optimized across market participants
- Individual transmission tariffs
- Limited transmission dedicated to realtime market
- Balancing Authority Area (BAA) boundaries and associated reliability obligations retained

Market footprints considered in the study reflect futures where market seams are created and futures where the West consolidates into a single market footprint

Day Ahead Market (DA)

- Centrally optimized real-time and dayahead energy market
- Individual transmission tariffs
- Limited transmission dedicated to market at assumed rate (other transactions must pay tariff rate for transmission)
- BAA boundaries and associated reliability obligations retained

RTO

- Centrally optimized real-time and day-ahead energy market
- Joint transmission tariff for participants in a given footprint
- Transmission used up to reliability limit
- BAA boundaries and reliability obligations consolidated

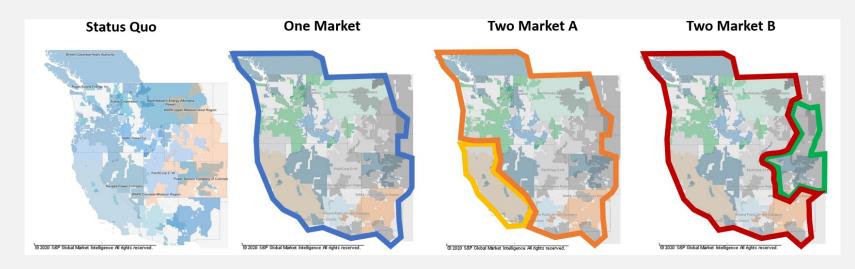




A summary of the seven market scenarios considered in this analysis are summarized below:

- Status Quo EIM: Status Quo scenario in which real-time markets proceed with planned EIM expansions.
- Status Quo DA: Scenario with same footprint as the Status Quo EIM scenario, but the real-time market is replaced with a day-ahead market.
- 1Mkt DA: Day-ahead market across the Western United States.

- 2Mkt A DA: Two day-ahead markets operate in parallel in the "Two Market A" footprint shown on the previous slide.
- 1Mkt RTO: RTO market across the Western United States.
- 2Mkt A RTO: Two RTO markets operate in parallel in the "Two Market A" footprint.
- 2Mkt B RTO: Two RTO markets operate in parallel in the "Two Market B" footprint.





Summary of Market Modeling Assumptions

A		Market Construct	
Assumption	EIM Markets	Day-ahead Markets	RTO Markets
Real-time intra-market trading costs	No cost for market transactions	\$3/MWh for market transactions above EIM-levels (which are \$0/MWh)	No cost for all transactions
Day-ahead intra-market trading costs	Tariff rate + \$4	\$3/MWh for market transactions	No cost for all transactions
Real-time trading costs for market exports and out-of-market transactions	Tariff rate + \$2	Tariff rate + \$2	Tariff rate + \$2 (exports only)
Day-ahead trading costs for market exports and out-of-market transactions	Tariff rate + \$4	Tariff rate + \$4	Tariff rate + \$4 (exports only)
Transmission available for market transactions	~15% of inter-area transfer capability for real-time transactions	~30% of inter-area transfer capability for day-ahead transactions, 15% for real-time	100% of inter-area transfer capability for day-ahead and real-time transactions
CAISO export limit	Real-time: 7000 MW Day-ahead: 2000 MW	Real-time: No limit Day-ahead: No limit, except for 2 Market A which has 7,000	Real-time: No limit Day-ahead: No limit, except for 2 Market A which has 7,000
Operating reserves	BA and reserve sharing g	group obligations retained	BAs consolidated and reserves held across market footprint
Flexibility reserves	BA-level constraint based on su volatility and	BAs consolidated and reserves held across market footprint	

ENERGY Updated SO_2 , NO_X and $PM_{2.5}$ Emission Rates

Energy Strategies updated emission rates for thermal units in California to align with assumptions sourced from the CPUC IRP planning process

GridL B

- The SO₂ and NO_X emission rates in the WECC Anchor Dataset are blended rates using emissions information from EIA, CEC, and other databases, and do not accurately reflect emissions from generators in CA, which have more advanced emission control technologies.
 - Emissions from units in CA are typically lower than those from units in other states; therefore, using blended rates result in higher-than-expected emission amounts.
- Emissions amounts were updated using emissions rates from the CPUC (2019-20 IRP: Proposed Reference System Portfolio Validation with SERVM Reliability and Production Cost Modeling).
 - Annual SO₂, NO_x, and PM 2.5 emissions from each thermal unit in CA were recalculated using CPUC emission rates, based on their fuel consumption.

Summary of Adopted Emission Rates for California Generators

Generator	Emis	sion Rate (Ib/MN	\Btu)
Туре	NO _x	PM2.5	SO ₂
Biomass	0.1938	0.0717	0.0276
СС	0.0078	0.0066	0.0006
Cogen	0.0334	0.0066	0.0007
Biogas	0.1059	0.0291	0.0361
СТ	0.0122	0.0066	0.0006
Geothermal	0.0058	0.0061	0.0000
Steam	0.0125	0.0073	0.0007
ICE	0.0220	0.0096	0.0014
Solar Thermal	0.0026	0.0000	0.0000

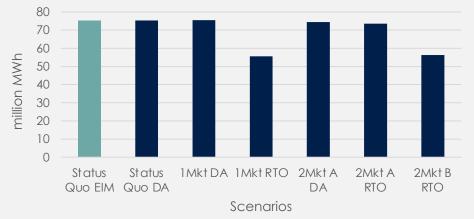


Study Results

The following results explore how the regionalization of energy markets may impact California thermal generation dispatch, on aggregate and within Disadvantaged Communities (DACs)



ENERGY Study Metrics for CA Aggregated Thermal Generation



CA Annual Thermal Generation

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Thermal Generator Capacity Factor



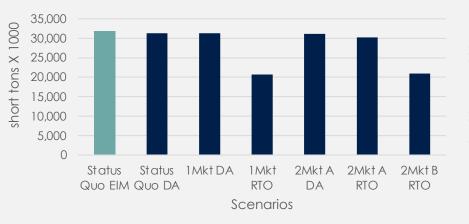
- The Status Quo EIM scenario assumes continued proliferation of EIM markets in the West and is the reference point for evaluating changes in dispatch
- With the DA Market scenarios, there was no material change in thermal fleet dispatch in California
 - However, a slight decrease in capacity factor was observed for all DA Market scenarios

- Under the 2 Market A RTO scenario (e.g., where California maintains a separate RTO), a small reduction in dispatch was observed
- 1 Market RTO and 2 Market B RTO scenarios caused thermal dispatch to decrease by roughly 25%

ENERGY Study Metrics for CA Aggregated Thermal Generation (cont.)

CO₂ Emissions

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SO₂ Emissions

- 0.20 short tons X 1000 0.15 0.10 0.05 0.00 Status Status 1MktDA 1MktRTO 2MktA 2Mkt A 2Mkt B Quo EIM Quo DA rto rto DA Scenarios
- CO₂, NO_X, SO₂ and PM 2.5 emissions fell
 by 30-35% for the 1 Market RTO and 2 Market B RTO scenarios
- Emissions were not materially impacted in the DA markets and 2 Market A RTO scenarios

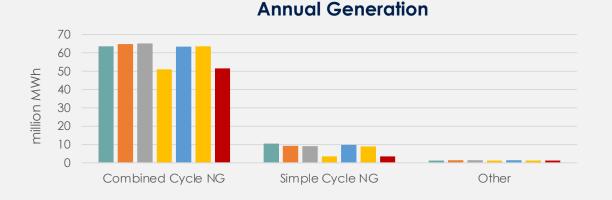


NO_x Emissions

PM 2.5 Emissions

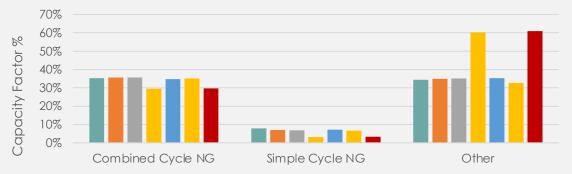


GridL^{AB} STREERGY Study Metrics by Thermal Generator Class

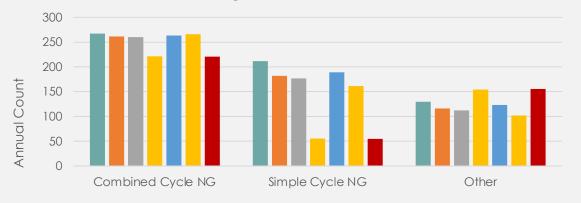


■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO

Capacity Factor



■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO



Average Number of Starts

■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO

 The Combined Cycle and Simple Cycle fleets experienced significant downward dispatch in both the 1 Market RTO and 2 Market B RTO scenarios

ENERGY Study Metrics by Thermal Generator Class (cont.)

CO₂ Emissions

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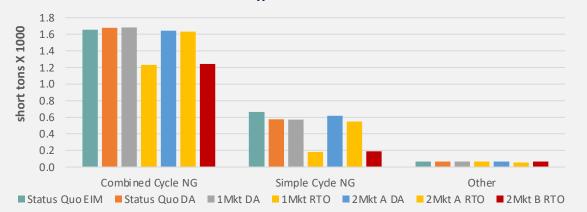
■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO

SO₂ Emissions

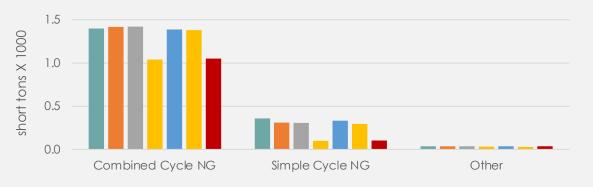


■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO

PM 2.5 Emissions



NO_x Emissions



■ Status Quo EIM ■ Status Quo DA ■ 1 Mkt DA ■ 1 Mkt RTO ■ 2 Mkt A DA ■ 2 Mkt A RTO ■ 2 Mkt B RTO

Mapping Thermal Units to DACs GridL^{*}B ENERGY STRATEGIES

- Roughly 52% of thermal units in CA are located in DACs
- Most DACs contain five or fewer generators, with 2 DACs accounting for nearly 30% of the capacity within DACs

	-	Fotal Capacity	SQ RT EIM				Total Capacity	SQ RT EIM	
DAC ID	Generator Count	(MW)	Generation (MWh)	Approximate Location	DAC ID	Generator Count	(MW)	Generation (MWh)	Approximate Location
6029003304	21	255	<mark>4</mark> 8044684	Unincorporated Kern County area	6019001500	2	97	130129	Unincorporated Fresno County area
6037980007	11	228		Long Beach	6099003002	4	212	122017	Unincorporated Stanislaus County area
6013305000	3	84			6071001906	2	80	116317	Ontario
6037980030	6	72		El Segundo	6019003900	3	159	112298	Unincorporated Fresno County area
6037121102	2	57	6 1759361	Los Angeles	6037570202	1	50	108688	Long Beach
6013309000	2	60	4 1707319	Pittsburg	6019008302	7	598	87632	Unincorporated Fresno County area
6037408202	5	52	0 1230013	Industry	6065030900	2	106	85434	Riverside
6095253500	4	46	0 1174463	Unincorporated Solano County area	6031001601	2	100	65840	Unincorporated Kings County area
6001437101	1	31	5 1110156	Hayward	6031001200	2	98		Unincorporated Kings County area
6025011400	3	28	8 923122	El Centro	6071002207	2	82		Rancho Cucamonga
6037310800	2	35	2 912543	Burbank	6019000800	1	11		Unincorporated Fresno County area
6099003700	3	33	6 900861	Unincorporated Stanislaus County area	6029003303	3	75		Unincorporated Kern County area
6037980002	1	40		Carson	6037980033	1	47		Long Beach
6013315000	1	12		Unincorporated Contra Costa County area	6067007301	1	74		McClellan Park
6071009116	1	34		Adelanto	6095252402	1	48		Unincorporated Solano County area
6029005103	17	88		Unincorporated Kern County area	6107004300	1	48		Unincorporated Tulare County area
6085504602	5	31		San Jose	6037550300	1	47		Norwalk
6037532400	2	13		Vernon	6065045707	1	80		Coachella
6013358000	3	6	5 429134	Rodeo	6099002002	4	124		
6085512602	4	25		Unincorporated Santa Clara County area		2	F		Empire
6037980014	1	10		Los Angeles	6025010600	2	50		Brawley
6085505202	2	15	1 240191	Santa Clara	6029006500	2	57		California City
6059087805	3	17	5 224290	Stanton	6029001600	2	63		Bakersfield
6071007107	5	25	4 184908	Grand Terrace	6029003700	2	7		Unincorporated Kern County area
6067004501	1	15	7 183869	Sacramento	6111002905	1	49		Unincorporated Ventura County area
6073016202	2	9	3 182588	El Cajon	6073005000	1	6		San Diego
6099000602	8	18	2 171137	Modesto	6039000507	1	4		Unincorporated Madera County area
6067005205	2	11	5 170062	Sacramento	6077003900	1	5	410	Unincorporated San Joaquin County area
6019006100	1	4	8 164917	Unincorporated Fresno County area	6073013307	1	35	101	Chula Vista
6037294830	5	24	5 136895	Los Angeles	Not in DAC	168	16475	39732399	

Impacts of Regional Market Scenarios on Generation and Capacity Factors of Generator Located in DACs

 Results for thermal units in DACs are similar to those of the broader CA fleet

GridL

- A large RTO market which includes California results in significant decreases in generation and emissions in most DACs as compared to the Status Quo EIM case.
 - Under the **1 Market RTO** and **2 Market B RTO** scenarios, only 3 out of 58 DACs (in Modesto, Antioch, and Burbank) experienced generation *increases*; while generation *decreased* by more than 60% in 34 DAC regions.
- Under a DA scenario, many DACs saw increases in generations and emissions compared to the Status Quo EIM case

Generation increased in 15 DACs in the 2 Market A
DA scenario and in 17 DACs in the 1 Market DA scenario, with average increases of 9 -

11%. No DAC experienced decreases of greater than 60% in any DA market scenario.

- Maps of DACs in California's major metro areas (see subsequent slides) show that DA markets are likely to produce mixed impacts on thermal generation (with generation increasing in some areas and decreasing in others).
- Takeaway: RTOs that include California in a broader market footprint more consistently result in decreases in thermal generation and associated emissions. When California operates its own separate RTO, emissions reductions are lower.

Study Metrics for Generators in DACs ENERGY STRATEGIES GridL

Thermal Generation in DACs



Capacity Factor in DACs



Scenarios

CO₂ Emissions in DACs



Scenarios

SO₂ Emissions in DACs



NO_x Emissions in DACs



PM 2.5 Emissions in DACs



Scenarios

Generation Capacity

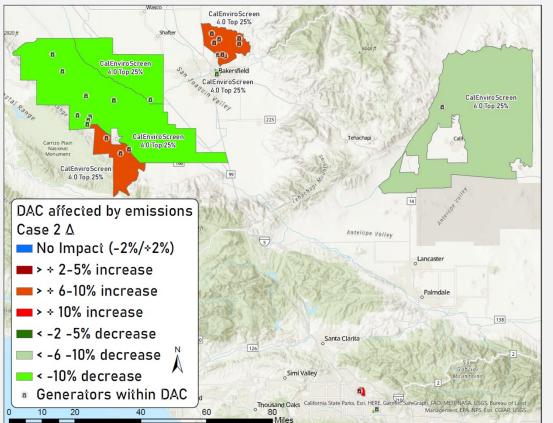
- In the DACs with the greatest amount of generation capacity, DA markets had minimal impacts on thermal generation
 - However, the 1 Market RTO and 2 Market B RTO scenarios resulted in a 23% decrease in generation and emissions, on average

Filtering for DACs with Greatest Thermal Generator Capacity

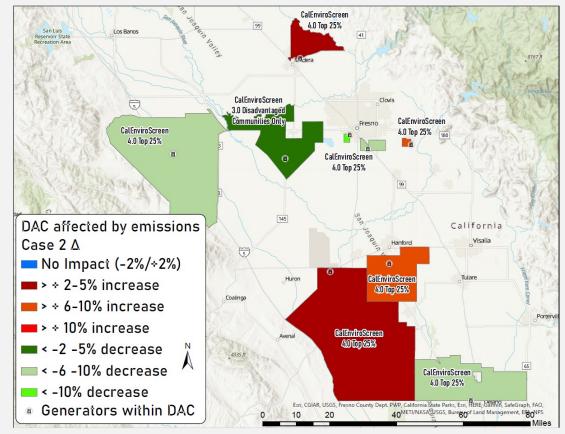
Generator	Total Capacity	SQ RT EIM		%	change fror	n SQ EIM Sc	enario			
Count	(MW)	Generation (MWh)	SQ RT DA	1Mkt DA	1Mkt RTO	Mkt A DA	2Mkt A RTO	2Mkt B RTO	Approximate Location	DAC Category
21	2554	8044684	-1.50%	-0.97%	-11.92%	-2.03%	-1.80%	-10.74%	Jnincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
11	228 <mark>6</mark>	5 <mark>072700</mark>	9.28%	10.09%	-33.75%	9.68%	-7.82%	-33.16%	ong Beach	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
17	880	671974	-28.17%	-29.35%	-52.74%	-15.66%	-26.36%	-50.56%	Jnincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
3	840	2626561	12.46%	13.44%	19.49%	4.00%	13.02%	20.46%	Antioch	CalEnviroScreen 4.0 Top 25%
6	724	2569527	-2.78%	-2.49%	-33.92%	-3.56%	-4.24%	-34.12%	El Segundo	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
2	604	1707319	14.28%	14.75%	-26.19%	6.96%	16.81%	-26.18%	Pittsburg	CalEnviroScreen 4.0 Top 25%
7	598	87632	-25.50%	-28.40%	-88.74%	-16.35%	-31.78%	-89.00%	Jnincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
	Count 21	21 2554 11 2286 17 880 3 840 6 724 2 604	Count (MW) Generation (MWh) 21 2554 8044684 11 2286 5072700 17 880 671974 3 840 2626561 6 724 2569527 2 604 1707319	Count (MW) Generation (MWh) SQ RT DA 21 2554 8044684 -1.50% 11 2286 5072700 9.28% 17 880 671974 -28.17% 3 840 2626561 12.46% 6 724 2569527 -2.78% 2 604 1707319 14.28%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 21 2554 8044684 -1.50% -0.97% 11 2286 5072700 9.28% 10.09% 17 880 671974 -28.17% -29.35% 3 840 2626561 12.46% 13.44% 6 724 2569527 -2.78% -2.49% 2 604 1707319 14.28% 14.75%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 1Mkt RTO 21 2554 8044684 -1.50% -0.97% -11.92% 11 2286 5072700 9.28% 10.09% -33.75% 17 880 671974 -28.17% -29.35% -52.74% 3 840 2626561 12.46% 13.44% 19.49% 6 724 2569527 -2.78% -2.49% -33.92% 2 604 1707319 14.28% 14.75% -26.19%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 1Mkt RTO PMkt A DA 21 2554 8044684 -1.50% -0.97% -11.92% -2.03% 11 2286 5072700 9.28% 10.09% -33.75% 9.68% 17 880 671974 -28.17% -29.35% -52.74% -15.66% 3 840 2626561 12.46% 13.44% 19.49% 4.00% 6 724 2569527 -2.78% -2.49% -33.92% -3.56% 2 604 1707319 14.28% 14.75% -26.19% 6.96%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 1Mkt RTO 2Mkt A DA 2Mkt A RTO 21 2554 8044684 -1.50% -0.97% -11.92% -2.03% -1.80% 11 2286 5072700 9.28% 10.09% -33.75% 9.68% -7.82% 17 880 671974 -28.17% -29.35% -52.74% -15.66% -26.36% 3 840 2626561 12.46% 13.44% 19.49% 4.00% 13.02% 6 724 2569527 -2.78% -2.49% -33.92% -3.56% -4.24% 2 604 1707319 14.28% 14.75% -26.19% 6.96% 16.81%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 1Mkt RTO Mkt A DA 2Mkt A RTO 2Mkt A RTO 2Mkt A RTO 2Mkt B RTO 21 2554 8044684 -1.50% -0.97% -11.92% -2.03% -1.80% -10.74% 11 2286 5072700 9.28% 10.09% -33.75% 9.68% -7.82% -33.16% 17 880 671974 -28.17% -29.35% -52.74% -15.66% -26.36% -50.56% 3 840 2626561 12.46% 13.44% 19.49% 4.00% 13.02% 20.46% 6 724 2569527 -2.78% -2.49% -33.92% -3.56% -4.24% -34.12% 2 604 1707319 14.28% 14.75% -26.19% 6.96% 16.81% -26.18%	Count (MW) Generation (MWh) SQ RT DA 1Mkt DA 1Mkt RTO PMkt A DA 2Mkt A RTO 2Mkt B RTO Approximate Location 21 2554 8044684 -1.50% -0.97% -11.92% -2.03% -1.80% -10.74% Jnincorporated Kern County area 11 2286 5072700 9.28% 10.09% -33.75% 9.68% -7.82% -33.16% ong Beach 17 880 671974 -28.17% -29.35% -52.74% -15.66% -26.36% -50.56% Jnincorporated Kern County area 3 840 2626561 12.46% 13.44% 19.49% 4.00% 13.02% 20.46% Antioch 6 724 2569527 -2.78% -2.49% -33.92% -3.56% -4.24% -34.12% I Segundo 2 604 1707319 14.28% 14.75% -26.19% 6.96% 16.81% -26.18% Pittsburg

Changes in Generation Under a **Status Quo DA** Markets Scenario*

DACs in Bakersfield

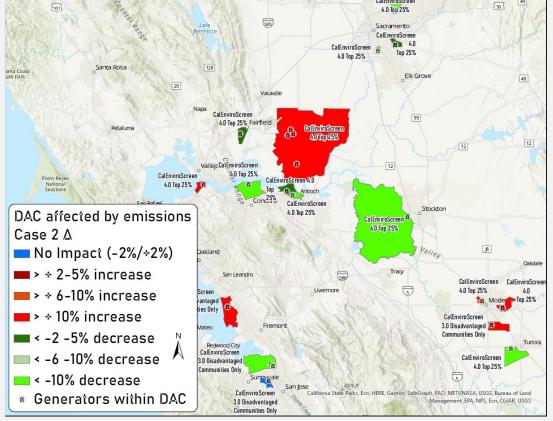


DACs in Fresno

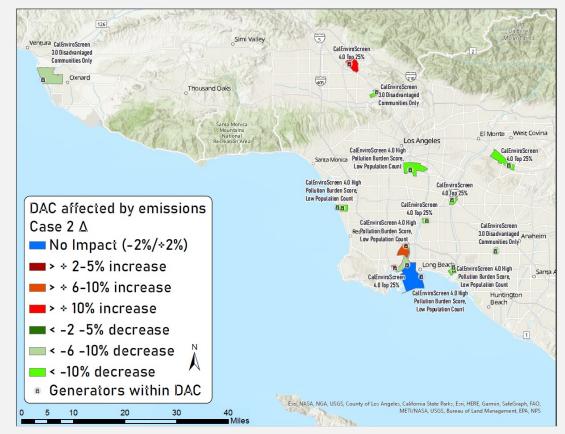


GridLAB STRATEGIES Changes in Generation Under a Status Quo DA Markets Scenario* (cont.)

DACs in Bay Area and Central Valley



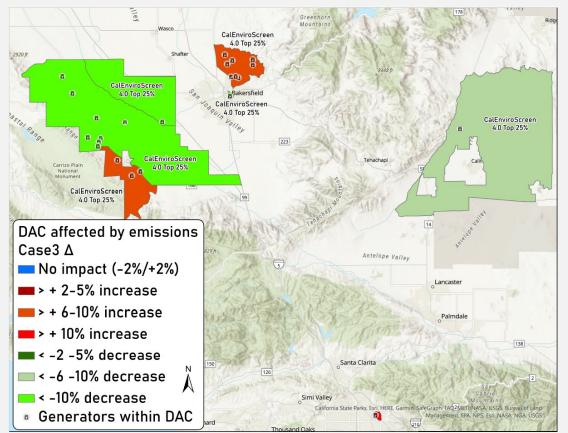
DACs in Los Angeles and Ventura County



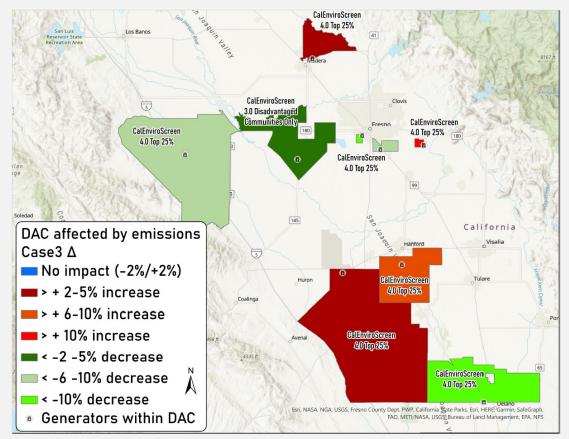
ENERGY Changes in Generation Under a **1 Market DA** Scenario*

DACs in Bakersfield

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DACs in Fresno

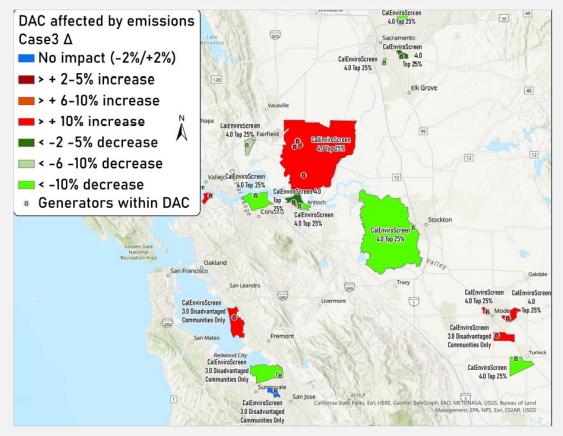


*as compared to Status Quo EIM Markets scenario

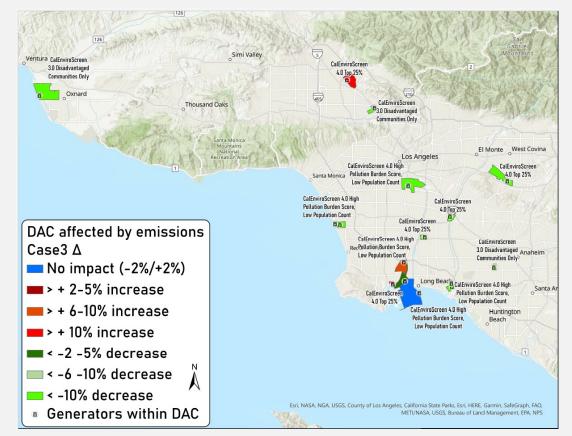
Changes in Generation Under a **1 Market DA** Scenario* (cont.)

DACs in Bay Area and Central Valley

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DACs in Los Angeles and Ventura County

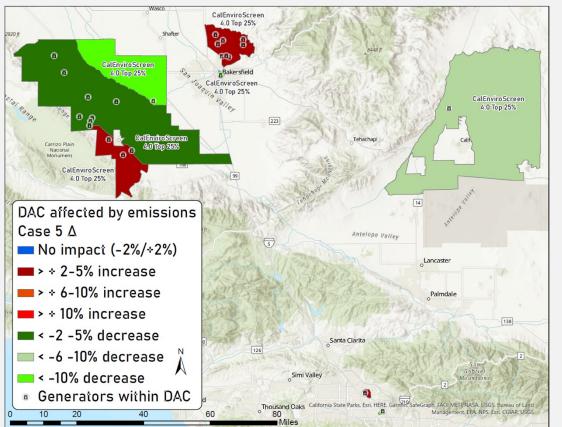


^{*}as compared to Status Quo EIM Markets scenario

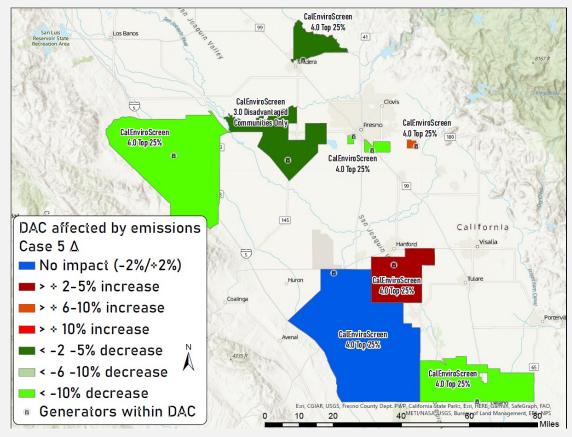
ENERGY Changes in Generation Under a **2 Market A DA** Scenario*

DACs in Bakersfield

GridL B



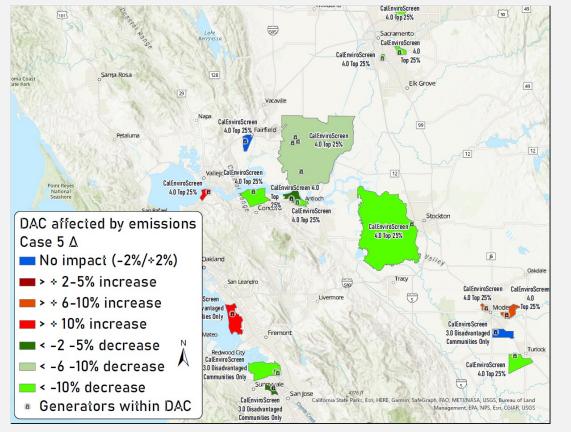
DACs in Fresno



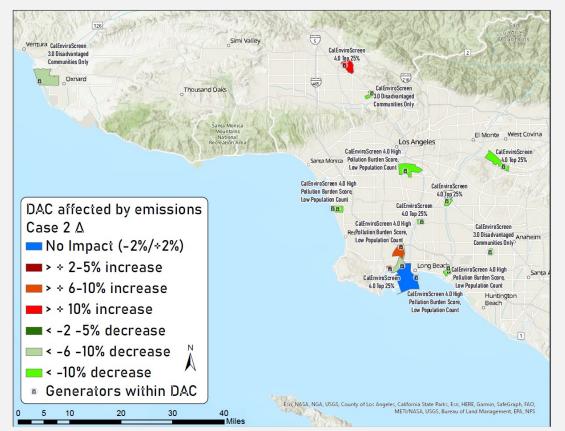
Changes in Generation Under a **2 Market A DA** Scenario* (cont.)

DACs in Bay Area and Central Valley

GridL 贫 B



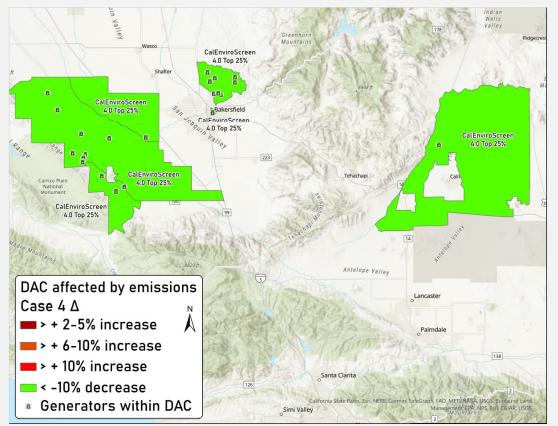
DACs in Los Angeles and Ventura County



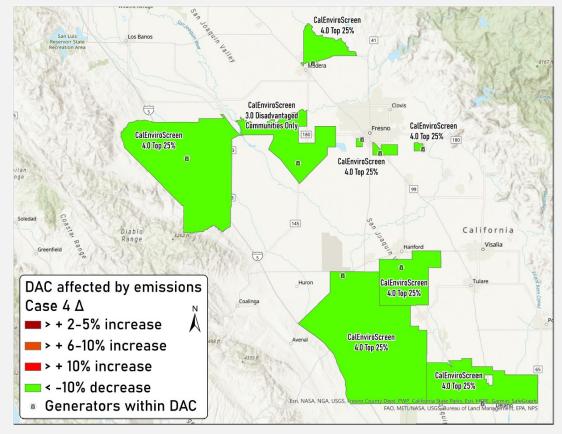
ENERGY Changes in Generation Under a **1 Market** RTO Scenario*

DACs in Bakersfield

GridL B



DACs in Fresno

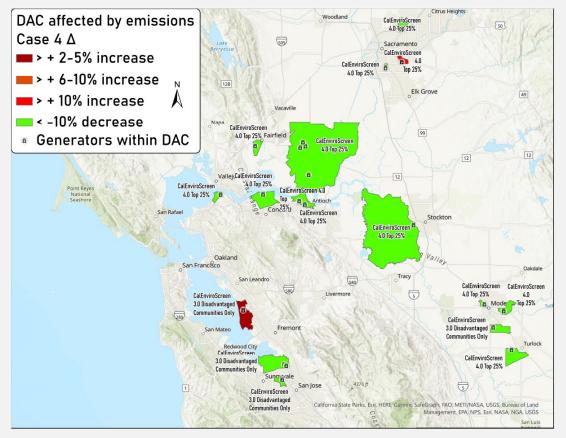


*as compared to Status Quo EIM Markets scenario

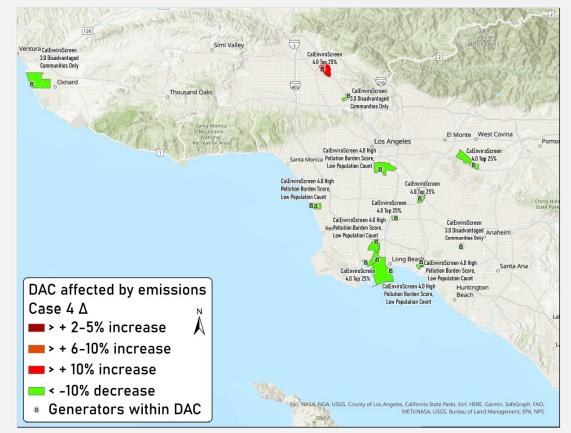
ENERGY STRATEGIES Changes in Generation Under a 1 Market RTO Scenario* (cont.)

DACs in Bay Area and Central Valley

GridL B



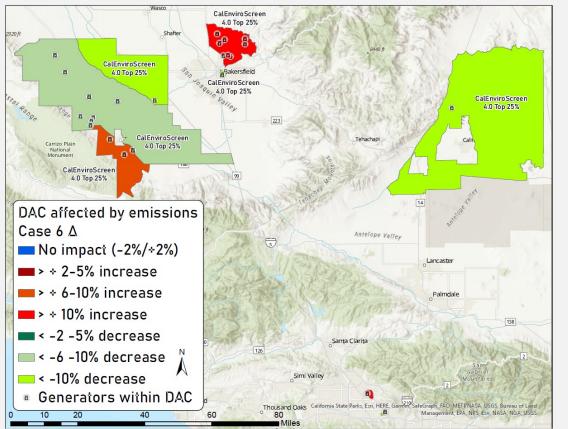
DACs in Los Angeles and Ventura County



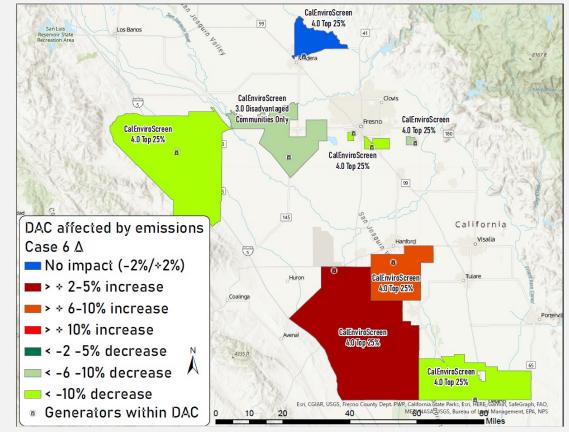
ENERGY Changes in Generation Under a **2 Market A RTO** Scenario*

DACs in Bakersfield

GridL B

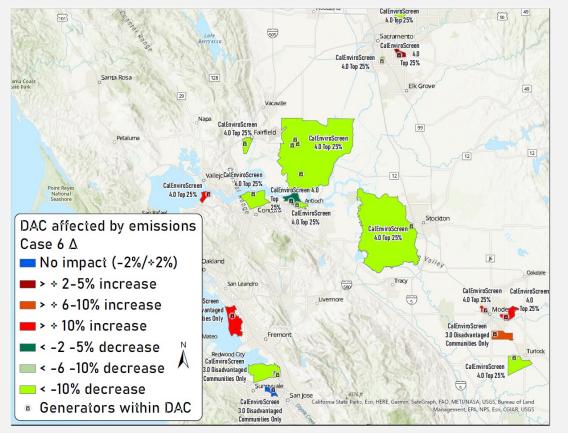


DACs in Fresno

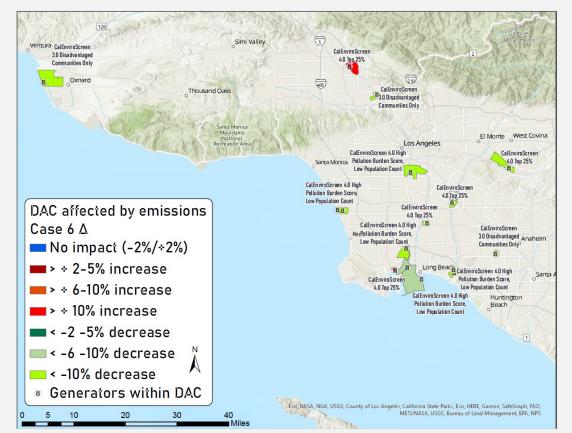


GridLAB STRATEGY Changes in Generation Under a 2 Market A RTO Scenario* (cont.)

DACs in Bay Area and Central Valley



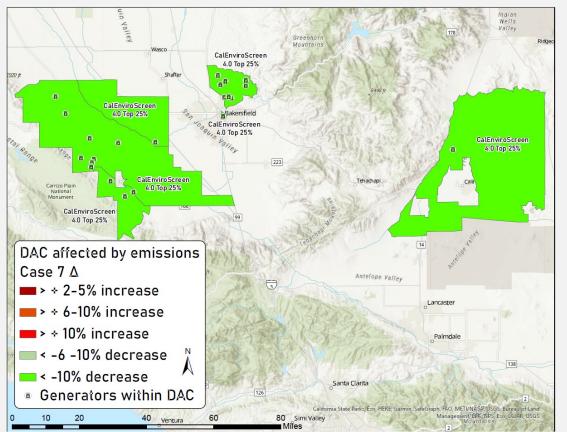
DACs in Los Angeles and Ventura County



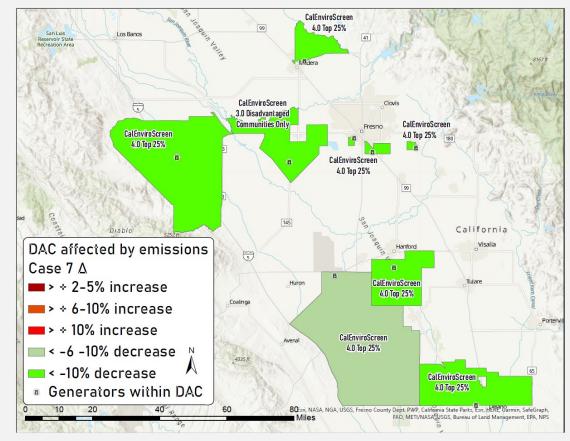
ENERGY Changes in Generation Under a **2 Market B RTO** Scenario*

DACs in Bakersfield

GridL B



DACs in Fresno

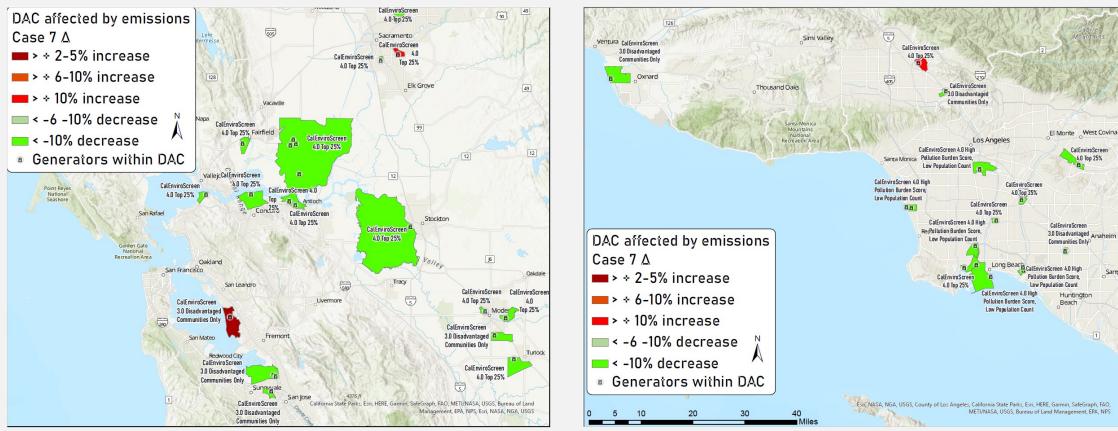


*as compared to Status Quo EIM Markets scenario

ENERGY STRATEGIES Changes in Generation Under a 2 Market B RTO Scenario* (cont.)

DACs in Bay Area and Central Valley

GridL 贫B



DACs in Los Angeles and Ventura County

*as compared to Status Quo EIM Markets scenario

Santa



Appendix

Capacity Factor and Generation Changes for Each DAC by Market Scenarios



GridLTB STRATEGIES Capacity Factor of DAC Generation in Different Scenarios

	Generator	Total Capacity	SQ RT EIM			Ca	pacity Factor %					
DAC ID	Count	(MW)	Generation (MWh)	SQ RT EIM	SQ DA	1Mkt DA	1Mkt RTO	2Mkt A DA	2Mkt A RTO	2Mkt B RTO	Approximate Location	DAC Category
6029003304	21	2554	8044684	36%	35%	36%	32%	35%	35%	32%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6037980007	11	2286	5 <mark>072700</mark>	25%	28%	28%	17%	28%	23%	17%	Long Beach	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013305000	3	840	2626561	36%	40%	40%	43%	37%	40%	43%	Antioch	CalEnviroScreen 4.0 Top 25%
6037980030	6	724	2569527	40%	39%	39%	27%	39%	39%	27%	El Segundo	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6037121102	2	576	1759361	35%	39%	40%	38%	39%	36%	38%	Los Angeles	CalEnviroScreen 4.0 Top 25%
6013309000	2	604	1707319	32%	37%	37%	24%	35%	38%	24%	Pittsburg	CalEnviroScreen 4.0 Top 25%
6037408202	5	520	1230013	27%	25%	25%	13%	24%	23%	13%	Industry	CalEnviroScreen 4.0 Top 25%
6095253500	4	460	1174463	29%	31%	31%	20%	30%	32%	20%	Unincorporated Solano County area	CalEnviroScreen 4.0 Top 25%
6001437101	1	315	1110156	40%	43%	43%	30%	42%	44%	30%	Hayward	CalEnviroScreen 3.0 Disadvantaged Communities Only
6025011400	3	288	923122	37%	33%	29%	23%	34%	23%	23%	El Centro	CalEnviroScreen 4.0 Top 25%
6037310800	2	352	912543	30%	35%	35%	31%	35%	33%	31%	Burbank	CalEnviroScreen 3.0 Disadvantaged Communities Only
6099003700	3	336	900861	31%	27%	27%	19%	25%	23%	19%	Unincorporated Stanislaus County area	CalEnviroScreen 4.0 Top 25%
6037980002	1	400	756471	22%	13%	13%	3%	15%	12%	3%	Carson	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013315000	1	127	735715	66%	70%	70%	40%	69%	73%	40%	Unincorporated Contra Costa County area	CalEnviroScreen 4.0 Top 25%
6071009116	1	342	703639	23%	25%	25%	2%	25%	16%	2%	Adelanto	CalEnviroScreen 4.0 Top 25%
6029005103	17	880	671974	9%	6%	6%	4%	7%	6%	4%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6085504602	5	318	611537	22%	26%	27%	11%	24%	27%	10%	San Jose	CalEnviroScreen 3.0 Disadvantaged Communities Only
6037532400	2	134	445116	38%	36%	36%	15%	36%	35%	14%	Vernon	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013358000	3	65	429134	76%	77%	78%	68%	77%	78%	68%	Rodeo	CalEnviroScreen 4.0 Top 25%
6085512602	4	258	290852	13%	14%	14%	5%	13%	14%	5%	Unincorporated Santa Clara County area	CalEnviroScreen 4.0 Top 25%
6037980014	1	107	271741	29%	25%	25%	6%	26%	23%	6%	Los Angeles	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6085505202	2	151	240191	18%	22%	22%	10%	20%	21%	10%	Santa Clara	CalEnviroScreen 3.0 Disadvantaged Communities Only
6059087805	3	175	224290	15%	11%	11%	4%	12%	11%	4%	Stanton	CalEnviroScreen 3.0 Disadvantaged Communities Only
6071007107	5	254	184908	8%	6%	6%	1%	6%	6%	1%	Grand Terrace	CalEnviroScreen 4.0 Top 25%
6067004501	1	157	183869	13%	13%	13%	8%	12%	13%	8%	Sacramento	CalEnviroScreen 4.0 Top 25%
6073016202	2	93	182588	22%	18%	18%	4%	19%	16%	5%	El Cajon	CalEnviroScreen 4.0 Top 25%
6099000602	8	182	171137	11%	10%	10%	19%	9%	11%	19%	Modesto	CalEnviroScreen 4.0 Top 25%
6067005205	2	115	170062	17%	17%	17%	11%	16%	16%	10%	Sacramento	CalEnviroScreen 4.0 Top 25%
6019006100	1	48	164917	39%	38%	38%	34%	39%	36%	34%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6037294830	5	245	136895	6%	7%	7%	0%	9%	8%	0%	Los Angeles	CalEnviroScreen 4.0 Top 25%

GridLAB STRATEGIES Capacity Factor of DAC Generation in Different Scenarios (cont.)

	Generator	Total Capacity	SQ RT EIM			Ca	apacity Factor	r %				
DAC ID	Count	(MW)	Generation (MWh)	SQ RT EIM	SQ DA	1Mkt DA	1Mkt RTO	2Mkt A DA	2Mkt A RTO	2Mkt B RTO	Approximate Location	DAC Category
6019001500	2	97	130129	15%	13%	13%	5%	15%	14%	5%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6099003002	4	212	122017	7%	5%	5%	0%	5%	6%	0%	Unincorporated Stanislaus County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6071001906	2	80	116317	17%	9%	9%	1%	11%	9%	1%	Ontario	CalEnviroScreen 4.0 Top 25%
6019003900	3	159	112298	8%	8%	8%	2%	7%	8%	2%	Unincorporated Fresno County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6037570202	1	50	108688	25%	23%	22%	7%	22%	21%	7%	Long Beach	CalEnviroScreen 4.0 Top 25%
6019008302	7	598	87632	2%	1%	1%	0%	1%	1%	0%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6065030900	2	106	85434	9%	7%	7%	1%	8%	7%	1%	Riverside	CalEnviroScreen 3.0 Disadvantaged Communities Only
6031001601	2	100	65840	8%	5%	5%	1%	6%	6%	1%	Unincorporated Kings County area	CalEnviroScreen 4.0 Top 25%
6031001200	2	98	65180	8%	7%	7%	0%	7%	7%	1%	Unincorporated Kings County area	CalEnviroScreen 4.0 Top 25%
6071002207	2	82	63560	9%	5%	6%	1%	7%	6%	1%	Rancho Cucamonga	CalEnviroScreen 3.0 Disadvantaged Communities Only
6019000800	1	11	20755	21%	22%	22%	15%	20%	21%	16%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6029003303	3	75	20169	3%	2%	2%	1%	3%	2%	1%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6037980033	1	47	19176	5%	2%	2%	1%	3%	2%	0%	Long Beach	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6067007301	1	74	16243	3%	1%	1%	1%	1%	1%	0%	McClellan Park	CalEnviroScreen 4.0 Top 25%
6095252402	1	48	14398	3%	3%	3%	1%	3%	3%	1%	Unincorporated Solano County area	CalEnviroScreen 4.0 Top 25%
6107004300	1	49	14234	3%	2%	2%	0%	3%	2%	0%	Unincorporated Tulare County area	CalEnviroScreen 4.0 Top 25%
6037550300	1	47	12738	3%	2%	2%	1%	2%	2%	0%	Norwalk	CalEnviroScreen 4.0 Top 25%
6065045707	4	80	10770	2%	1%	1%	0%	1%	0%	0%	Coachella	CalEnviroScreen 3.0 Disadvantaged Communities Only
6099002002	2	124	4898	0%	0%	0%	0%	0%	0%	0%	Empire	CalEnviroScreen 4.0 Top 25%
6025010600	2	50	3775	1%	1%	1%	0%	1%	0%	0%	Brawley	CalEnviroScreen 4.0 Top 25%
6029006500	2	57	3059	1%	1%	1%	0%	1%	0%	0%	California City	CalEnviroScreen 4.0 Top 25%
6029001600	2	63	2889	1%	1%	1%	0%	0%	0%	0%	Bakersfield	CalEnviroScreen 4.0 Top 25%
6029003700	2	7	2223	4%	2%	2%	2%	3%	3%	1%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6111002905	1	49	1643	0%	0%	0%	0%	0%	0%	0%	Unincorporated Ventura County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6073005000	1	6	641	1%	1%	1%	0%	1%	1%	0%	San Diego	CalEnviroScreen 4.0 Top 25%
6039000507	1	4	571	2%	2%	2%	0%	2%	2%	0%	Unincorporated Madera County area	CalEnviroScreen 4.0 Top 25%
6077003900	1	5	410	1%	1%	1%	0%	1%	0%	0%	Unincorporated San Joaquin County area	CalEnviroScreen 4.0 Top 25%
6073013307	1	35	101	0%	0%	0%	0%	0%	0%	0%	Chula Vista	CalEnviroScreen 4.0 Top 25%
Not in DAC	168	16475	39732399	28%	27%	27%	21%	27%	27%	21%		

GridL^{*}B STRATEGIES Change in DAC generation from Status Quo EIM Scenario

				% (Change in Ge	eneration fro	omStatus Qu	o EIM Scena	ario		
		Total Capacity	SQ RT EIM	Status Quo				2Mkt A	2Mkt B		
DAC ID	Generator Count	(MW)	Generation (MWh)	DA	1Mkt DA	1Mkt RTO	2Mkt A DA	RTO	RTO	Approximate Location	DAC Category
6029003304	21	2554	8044684	-2%	-1%	-12%	-2%	-2%	-11%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6037980007	11	228 <mark>6</mark>	5 <mark>072700</mark>	9%	10%	-34%	10%	-8%	-33%	Long Beach	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013305000	3	840	2626561	12%	13%	19%	4%	13%	20%	Antioch	CalEnviroScreen 4.0 Top 25%
6037980030	6	724	2569527	-3%	-2%	-34%	-4%	-4%	-34%	El Segundo	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6037121102	2	576	1759361	13%	14%	8%	11%	3%	10%	Los Angeles	CalEnviroScreen 4.0 Top 25%
6013309000	2	604	1707319	14%	15%	-26%	7%	17%	-26%	Pittsburg	CalEnviroScreen 4.0 Top 25%
6037408202	5	520	1230013	8 -8%	-7%	-52%	-10%	-14%	-51%	Industry	CalEnviroScreen 4.0 Top 25%
6095253500	4	460	1174463	6%	5%	-32%	3%	8%	-30%	Unincorporated Solano County area	CalEnviroScreen 4.0 Top 25%
6001437101	1	315	1110156	5 7%	7%	-26%	4%	10%	-25%	Hayward	CalEnviroScreen 3.0 Disadvantaged Communities Only
6025011400	3	288	923122	-10%	-21%	-38%	-8%	-36%	-37%	El Centro	CalEnviroScreen 4.0 Top 25%
6037310800	2	352	912543	19%	20%	3%	19%	13%	4%	Burbank	CalEnviroScreen 3.0 Disadvantaged Communities Only
6099003700	3	336	900861	-12%	-12%	-37%	-20%	-25%	-39%	Unincorporated Stanislaus County area	CalEnviroScreen 4.0 Top 25%
6037980002	1	400	756471	-40%	-39%	-86%	-29%	-44%	-87%	Carson	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013315000	1	127	735715	5 7%	6%	-40%	5%	10%	-40%	Unincorporated Contra Costa County area	CalEnviroScreen 4.0 Top 25%
6071009116	1	342	703639	7%	7%	-91%	8%	-30%	-92%	Adelanto	CalEnviroScreen 4.0 Top 25%
6029005103	17	880	671974	-28%	-29%	-53%	-16%	-26%	-51%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6085504602	5	318	611537	20%	22%	-50%	9%	22%	-52%	San Jose	CalEnviroScreen 3.0 Disadvantaged Communities Only
6037532400	2	134	445116	-4%	-4%	-61%	-5%	-9%	-63%	Vernon	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6013358000	3	65	429134	2%	3%	-11%	2%	3%	-10%	Rodeo	CalEnviroScreen 4.0 Top 25%
6085512602	4	258	290852	12%	10%	-65%	2%	5%	-64%	Unincorporated Santa Clara County area	CalEnviroScreen 4.0 Top 25%
6037980014	1	107	271741	-12%	-13%	-78%	-11%	-19%	-78%	Los Angeles	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6085505202	2	151	240191	21%	22%	-46%	8%	17%	-44%	Santa Clara	CalEnviroScreen 3.0 Disadvantaged Communities Only
6059087805	3	175	224290	-23%	-24%	-76%	-15%	-24%	-75%	Stanton	CalEnviroScreen 3.0 Disadvantaged Communities Only
6071007107	5	254	184908	-29%	-29%	-86%	-22%	-30%	-86%	Grand Terrace	CalEnviroScreen 4.0 Top 25%
6067004501	1	157	183869	-5%	-6%	-42%	-13%	-5%	-38%	Sacramento	CalEnviroScreen 4.0 Top 25%
6073016202	2	93	182588	-17%	-20%	-81%	-15%	-28%	-78%	El Cajon	CalEnviroScreen 4.0 Top 25%
6099000602	8	182	171137	-4%	-4%	73%	-13%	3%	79%	Modesto	CalEnviroScreen 4.0 Top 25%
6067005205	2	115	170062	2 1%	0%	-36%	-6%	-6%	-38%	Sacramento	CalEnviroScreen 4.0 Top 25%
6019006100	1	48	164917	-2%	-2%	-13%	-1%	-7%	-13%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6037294830	5	245	136895	16%	15%	-97%	42%	24%	-97%	Los Angeles	CalEnviroScreen 4.0 Top 25%

ENERGY STRATEGIES Change in DAC generation from Status Quo EIM Scenario (cont.)

				% Change in Generation fromStatus			omStatus Qu	o EIM Scena	ario		
		Total Capacity	SQ RT EIM	Status Quo				2Mkt A	2Mkt B		
DAC ID	Generator Count	(MW)	Generation (MWh)	DA	1Mkt DA	1Mkt RTO	2Mkt A DA	RTO	RTO	Approximate Location	DAC Category
6019001500	2	97	130129	-14%	-15%	-68%	-5%	-11%	-66%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6099003002	4	212	122017	-24%	-26%	-97%	-18%	-11%	-96%	Unincorporated Stanislaus County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6071001906	2	80	116317	-47%	-47%	-92%	-31%	-47%	-92%	Ontario	CalEnviroScreen 4.0 Top 25%
6019003900	3	159	112298	-5%	-5%	-75%	-7%	-7%	-77%	Unincorporated Fresno County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6037570202	1	50	108688	-9%	-10%	-74%	-11%	-14%	-74%	Long Beach	CalEnviroScreen 4.0 Top 25%
6019008302	7	598	87632	-26%	-28%	-89%	-16%	-32%	-89%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6065030900	2	106	85434	-22%	-21%	-85%	-16%	-20%	-86%	Riverside	CalEnviroScreen 3.0 Disadvantaged Communities Only
6031001601	2	100	65840	-32%	-36%	-91%	-15%	-26%	-90%	Unincorporated Kings County area	CalEnviroScreen 4.0 Top 25%
6031001200	2	98	65180	-12%	-13%	-94%	-2%	-7%	-90%	Unincorporated Kings County area	CalEnviroScreen 4.0 Top 25%
6071002207	2	82	63560	-39%	-38%	-89%	-23%	-37%	-87%	Rancho Cucamonga	CalEnviroScreen 3.0 Disadvantaged Communities Only
6019000800	1	11	20755	3%	3%	-32%	-4%	-1%	-26%	Unincorporated Fresno County area	CalEnviroScreen 4.0 Top 25%
6029003303	3	75	20169	-22%	-23%	-77%	-16%	-41%	-81%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6037980033	1	47	19176	-55%	-56%	-89%	-42%	-61%	-91%	Long Beach	CalEnviroScreen 4.0 High Pollution Burden Score, Low Population Count
6067007301	1	74	16243	-48%	-50%	-80%	-46%	-59%	-81%	McClellan Park	CalEnviroScreen 4.0 Top 25%
6095252402	1	48	14398	-19%	-26%	-63%	-10%	-18%	-57%	Unincorporated Solano County area	CalEnviroScreen 4.0 Top 25%
6107004300	1	49	14234	-34%	-35%	-88%	-16%	-35%	-87%	Unincorporated Tulare County area	CalEnviroScreen 4.0 Top 25%
6037550300	1	47	12738	-42%	-44%	-83%	-23%	-42%	-85%	Norwalk	CalEnviroScreen 4.0 Top 25%
6065045707	4	80	10770	-11%	-51%	-99%	-52%	-78%	-99%	Coachella	CalEnviroScreen 3.0 Disadvantaged Communities Only
6099002002	2	124	4898	-11%	-5%	-96%	-4%	-40%	-96%	Empire	CalEnviroScreen 4.0 Top 25%
6025010600	2	50	3775	-6%	-33%	-99%	-42%	-85%	-99%	Brawley	CalEnviroScreen 4.0 Top 25%
6029006500	2	57	3059	-5%	-9%	-92%	-2%	-75%	-93%	California City	CalEnviroScreen 4.0 Top 25%
6029001600	2	63	2889	11%	17%	-35%	-7%	-22%	-24%	Bakersfield	CalEnviroScreen 4.0 Top 25%
6029003700	2	7	2223	-32%	-34%	-57%	-21%	-27%	-66%	Unincorporated Kern County area	CalEnviroScreen 4.0 Top 25%
6111002905	1	49	1643	-7%	-7%	-87%	-9%	-63%	-92%	Unincorporated Ventura County area	CalEnviroScreen 3.0 Disadvantaged Communities Only
6073005000	1	6	641	-15%	-17%	-79%	-15%	-43%	-73%	San Diego	CalEnviroScreen 4.0 Top 25%
6039000507	1	4	571	-3%	-3%	-86%	5%	-8%	-87%	Unincorporated Madera County area	CalEnviroScreen 4.0 Top 25%
6077003900	1	5	410	-14%	-15%	-79%	-14%	-47%	-73%	Unincorporated San Joaquin County area	CalEnviroScreen 4.0 Top 25%
6073013307	1	35	101	-9%	-9%	-100%	-22%	-39%	-100%	Chula Vista	CalEnviroScreen 4.0 Top 25%
Not in DAC	168	16475	39732399	-1.31%	-0.90%	-24.82%	-2.49%	-1.39%	-23.89%		

GridL^{*}B