Los Angeles Department of Water and Power (Cindy Parsons)

See attached comment.

In MRR section 95111(h)(1)(B) Calculation of CAISO Markets Outstanding Emissions, Total California EDAM Emissions on page 152, there appears to be a typo in the description of "MWh below GHG counterfactual". Rather than "Megawatt-hours of **WEIM imports** used to serve California load that were below participating resources' EDAM GHG counterfactuals…" it should probably show "Megawatt-hours of **EDAM imports** used to serve California load that were below participating resources' EDAM GHG counterfactuals…"

(B) *Total California EDAM Emissions as calculated by CARB.* Annually, based on each day-ahead interval, CARB will calculate the CO_2 equivalent mass emissions associated with imported electricity in EDAM using the following equation:

$$CO_2e_{EDAM} = MWh_{below\ GHG\ counterfactual} \times EF_{unsp} \times TL$$

Where:

CO_2e_{EDAM} =	CO_2 equivalent mass emissions from Total California EDAM electricity (MT of CO_2e).
$MWh_{below\ GHG\ counterfactual}$ =	Megawatt-hours of WEIM imports used to serve California load that were below participating resources' EDAM GHG counterfactuals adjusted for net export constraints and electricity imports from committed capacity.
EF_{unsp} =	Default emission factor for unspecified electricity imports in 95111(b)(1).
EF_{unsp} =	0.428 MT of CO_2e/MWh.
TL =	1.02 (transmission loss correction factor) in 95111(b)(1).