Submit comment on draft summary report

Initiative: Assembly Concurrent Resolution 188

The ISO values stakeholder input on this preliminary draft, and plans to incorporate feedback received during the January 20 stakeholder call, and in written comments submitted by the deadline on February 3, into future iterations to ensure the accuracy and value of the final report. Please submit written comments to infoACR188@caiso.com.

Submitter information
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1. Provide a summary of your organization’s comments on the draft summary report and January 20, 2023 stakeholder call discussion:

SCE appreciates the opportunity to provide comments on the draft summary report that was developed for Assembly Concurrent Resolution 188.

SCE supports the efforts that the CAISO and the stakeholder community are taking towards forming an organized wholesale market such as EDAM. SCE believes that EDAM will be a positive step towards increasing reliability and cost savings for the customers of the west.

SCE generally agrees with how this report is constructed and believes the report provides good insight of the importance of regionalization and the efforts that are currently taking place in the West. SCE observes that effectively every report reviewed shows benefits from greater regional cooperation. The benefits include lower costs to customers, better reliability, and better integration of renewable resources. The report should be helpful for the California legislature to get a better picture of how important enhancing regional markets and regional grid operations are to California customers.

2. Provide your organization’s comments on the regional cooperation efforts in the West, as described in section 2 of the draft report:

SCE believes it would be helpful to include additional states such as Washington, Idaho, Montana, etc., and those adjacent to California in this section of the report. It would be helpful to understand if those other states (not mentioned in the report) are exploring regionalization.

See additional comments in question #3.
3. Provide your organization’s comments on the literature included in the review, as described in section 3 of the draft report:

SCE believes it would be beneficial to include additional policy studies (if available) under section 3 of the report. Section 3 includes policy studies from states such as Colorado, Arizona, and Oregon but does not include studies from states with BAAs participating in the WEIM such as Washington, Idaho, Montana etc. It would add value to include the benefits those states have produced since joining the WEIM.

4. Provide your organization’s comments on the annotated summary of the literature, as described in section 4 of the draft report:

SCE does not have any further comments.

5. Provide your organization’s comments on SB 100 and relevant updates, as described in section 5 of the draft report:

SCE does not have any further comments.

6. Provide any additional comments on the draft summary report and January 20, 2023 stakeholder call discussion:

SCE does not have any further comments.