

ACR 188 - Stakeholder Comments on Draft List of Studies

As the California ISO kicks-off its ACR-188 effort to summarize recent relevant studies on the impacts of expanded regional cooperation, we welcome your careful review of the proposed list of studies. Please use this form to provide feedback from your organization for the following items:

Name: Aly Koslow, Director Federal Regulatory Affairs and Compliance

Organization: Arizona Public Service

Email: Alyssa.Koslow@aps.com

1. Identify any listed studies you believe are most relevant or pertinent for inclusion in the ACR 188 report.

- I. *The State-led Market Study*
Utah Office of Energy Development
Prepared by Energy Strategies (July 2021)
- II. *Senate Bill 350 Study: The Impacts of a Regional ISO-Operated Power Market on California*
CAISO (2016)
 - a. **Provide your rationale for your selection(s).**
 - I. The study houses a Technical Report (beginning on page 81 of the document), which is of particular importance as it depicts potential market outcomes given differing service and footprint scenarios. The neutral and state-specific evaluation offers information for Western states to recognize potential benefits and impacts of expansion of their market participation. The report's "key findings" depict greater possible achieved annual gross savings in conjunction with a larger participating footprint and greater coordination.
 - II. Revisiting the SB 350 mandated study leverages existing and foundational information regarding possible market expansion. The study similarly concludes that greater coordination across the West through an expanded, CAISO operated market would result in environmental and economic benefits to California and Western participants.

2. Identify any listed studies you believe should not be included in the ACR 188 report.

None

a. Provide your rationale for your selection(s).

Not applicable

3. Identify any additional studies you believe should be included in the ACR 188 report.

None

a. Provide your rationale for your selection(s).

Not applicable.

4. Any additional general comments on the report development:

Arizona Public Service appreciates the opportunity to provide input in advance of CAISO fulfilling its responsibilities enacted by ACR 188 and looks forward to reviewing the results of CAISO's analysis.