

## 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:** Doug Marker  
**Organization:** Bonneville Power Administration  
**Email:** drmarker@bpa.gov

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

Bonneville has no comment to prioritize among the listed studies.

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

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

Bonneville has no comment to exclude any of the listed studies.

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

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

Final Review Draft, WIRED GHG Accounting Working Group Report, November 2020. Western Interconnect Regional Electricity Dialogue (WIRED); Center for the New Energy Economy, Colorado State University.  
<https://cnee.colostate.edu/wp-content/uploads/2021/01/final-review-draft-WIRED-GHG-accounting-work-group.pdf>

Final Review Draft, WIRED Resource Adequacy Working Group Report, November 2020. Western Interconnect Regional Electricity Dialogue (WIRED); Center for the New Energy Economy, Colorado State University.

[final-review-draft-WIRED-resource-adequacy-working-group.pdf \(colostate.edu\)](#)

Resource Sharing Among the Pacific States; Gridworks, January 2018

[Gridworks\\_ResourceAdequacy\\_online-2.pdf](#)

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

Bonneville suggests these reports as descriptive of the interaction of state legislative and regulatory policies with regional coordination objectives, and not necessarily for specific policy consideration in the ACR 188 report.

The two WIRED working group reports were produced by collaborations of Western utilities and state energy policy officials, renewable energy companies and public interest organizations to describe opportunities for coordination among state clean energy and economic policies. These reports are companion to the listed WIRED report “In Support of Western Regional Resource and Transmission Planning Coordination.”

The Gridworks report describes how resource adequacy policies for the Pacific states were structured at the time. The report has relevant background on the interaction of California’s resource adequacy policies with incentives for resource sharing among regional utilities.

**4. Any additional general comments on the report development:**

It is essential for readers of the report to understand that the scope of policy issues extend beyond solely those pertaining to the California Independent System Operator. California state law and regulatory policy include provisions that create barriers and frictions for the interaction of the California electric power system with the rest of the Western Interconnection.

Such provisions originate from objectives of California policy in the service of economic and environmental goals of the state. In some cases, these policies serve to encourage greenhouse gas emission reductions and clean energy development within California. In others, the policies support unique standards and accounting designed to advantage California ratepayers.

Consequences of these policies, however, may increase costs for California consumers by impeding access to clean and economic resources and increasing costs for system reliability. They may also impede California’s goals to support cost-effective reduction of greenhouse gas emissions.

Bonneville encourages consideration of the importance of regional cooperation in such policies. In many cases, increased regional cooperation will benefit from the direction of the Legislature and consideration in regulatory policy decisions.

For the immediate purpose of responding to ACR 188, Bonneville encourages the report to include discussion of such laws and regulations in addition to the authorities and governance of the California ISO.