

## 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:

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

Type	Title	Year	Prepared For	Prepared By	Link
Technical	Western Flexibility Assessment: Investigating the West's Changing Resource Mix and Implications for System Flexibility	2019	Western Interstate Energy Board (WIEB),	Energy Strategies	<a href="https://www.westernenergyboard.org/wp-content/uploads/2019/12/12-10-19-ES-WIEB-Western-Flexibility-Assessment-Final-Report.pdf">https://www.westernenergyboard.org/wp-content/uploads/2019/12/12-10-19-ES-WIEB-Western-Flexibility-Assessment-Final-Report.pdf</a>
Other	In Support of Western Regional Resource and Transmission Planning Coordination	2021	Western Interconnection Regional Electricity Dialogue (WIRED)	Gridworks, Center for the New Energy Economy	<a href="https://cnee.colostate.edu/wp-content/uploads/2021/11/Western-Resource-Transmission-Planning-Coordination-Rev-1.pdf">https://cnee.colostate.edu/wp-content/uploads/2021/11/Western-Resource-Transmission-Planning-Coordination-Rev-1.pdf</a>
Technical	The State-Led Market Study	2021	DOE, State Energy offices of UT, ID, CO, and MT	Energy Strategies, LLC	<a href="https://www.energystrat.com/s/Final-Roadmap-Market-and-Regulatory-Review-Report-210730.pdf">https://www.energystrat.com/s/Final-Roadmap-Market-and-Regulatory-Review-Report-210730.pdf</a>
Technical	Western RTO Economic Impact Study - Region-Wide Analysis	2022	Advanced Energy Economy (AEE)	Energy Strategies, LLC and Peterson and Associates	<a href="https://info.aee.net/hubfs/Western%20RTO%20Economic%20Impact%20Study%20Report.pdf">https://info.aee.net/hubfs/Western%20RTO%20Economic%20Impact%20Study%20Report.pdf</a>

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

Among the many excellent studies listed, four are worth highlighting as recent, thorough, and clear in their assessments of critical aspects of Western regionalization.

- The *Western Flexibility Assessment* provides detailed and well supported evidence that the West will face higher operational costs and emissions if it fails to develop broad

coordination of wholesale markets. The study is unique in its comprehensive assessment of transmission and demonstrates that full use of existing transmission infrastructure, in addition to coordinated wholesale electricity markets, can be an effective way to integrate renewable resources.<sup>1</sup>

- *In Support of Western Regional Resource and Transmission Planning Coordination* is also highly relevant considering its detailed discussion of the need to better coordinate resource planning and related transmission planning. It considers the benefits of transmission planning exercise at interconnection scale to assess capabilities and congestion related to achieving state goals.<sup>2</sup>
- *The State-Led Market Study* is a critical tool for western market expansion discussion as it compares the impacts of limited market development in the form of day ahead markets to the more advanced organized wholesale market structures that include joint transmission tariffs, consolidated balancing authorities, and long-term resource adequacy planning. Notably, the study results not only found that a full RTO model maximizes benefits across the region, but that load diversity benefits were highest in market footprints that connected California to the rest of the West.<sup>3</sup>
- **The current list of studies only includes the Road Map document for the State Led study and should also include the technical report found here:**  
**<https://static1.squarespace.com/static/59b97b188fd4d2645224448b/t/6148a012aa210300cbc4b863/1632149526416/Final+Roadmap+-+Technical+Report+210730.pdf>**
- Finally, *Western RTO Economic Impact Study - Region-Wide Analysis* builds upon the framework of the *State-Led Market Study* and adds clarity on the ability of an RTO construct to drive state-level financial benefits and drive up to 4,400 MWs of new corporate clean energy purchases by 2030.<sup>4</sup>

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

Type	Title	Year	Prepared For	Prepared By	Link

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

There are currently no studies that CEBA would request be removed. It is possible, however, that additional irrelevant studies could be suggested in this round of public comments. The study team should allow the public to comment on new studies added to the list during the next opportunity for input.

<sup>1</sup> [https://www.dora.state.co.us/pls/efi/efi\\_p2\\_v2\\_demo.show\\_document?p\\_dms\\_document\\_id=948065&p\\_session\\_id=](https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=948065&p_session_id=) page 17.

<sup>2</sup> [https://cnee.colostate.edu/wp-content/uploads/2021/11/Western\\_Resource\\_Transmission\\_Planning\\_Coordination\\_Rev\\_1.pdf](https://cnee.colostate.edu/wp-content/uploads/2021/11/Western_Resource_Transmission_Planning_Coordination_Rev_1.pdf), page ii.

<sup>3</sup> <https://static1.squarespace.com/static/59b97b188fd4d2645224448b/t/6148a012aa210300cbc4b863/1632149526416/Final+Roadmap+-+Technical+Report+210730.pdf>, page 6-7 and 37.

<sup>4</sup> <https://info.aee.net/hubfs/Western%20RTO%20Economic%20Impact%20Study%20Report.pdf>, page 41.

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

Type	Title	Year	Prepared For	Prepared By	Link
Technical	Renewable Energy Policy Pathways Report	2020	The Clean Energy Buyers Institute	The Brattle Group	<a href="https://cebi.org/research/renewable-energy-policy-pathways-report/">https://cebi.org/research/renewable-energy-policy-pathways-report/</a>
Technical	Designing the 21 <sup>st</sup> Century Electricity System	2021	The Clean Energy Buyers Institute	Grid Strategies LLC	<a href="https://cebi.org/research/designing-the-21st-century-electricity-system/">https://cebi.org/research/designing-the-21st-century-electricity-system/</a>
Technical	Pathways Towards Grid Decarbonization: Impacts and Opportunities for Energy Customers from Several U.S. Decarbonization Approaches	2022	The Clean Energy Buyers Institute	Resources for the Future	<a href="https://cebi.org/research/pathways-toward-grid-decarbonization/">https://cebi.org/research/pathways-toward-grid-decarbonization/</a>

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

CEBA believes the studies listed below substantively add to NREL's effort to summarize relevant studies on the impacts of expanded regional cooperation, such as customer savings, because they provide the unique and valuable perspective of large energy customers.

Below is a short summary of each resource and rationale for why CEBA believes they should be included.

- The *Renewable Energy Policy Pathways Report* is an analysis of pathways to increase renewable energy access and decrease costs of renewable energy procurement across the U.S. The report demonstrates how greater regional coordination through centrally organized wholesale markets are key to increasing customer options through virtual power purchase agreements (PPAs), reducing costs, and facilitating greater renewable energy integration. It also highlights the benefits organized wholesale markets provide to utilities as integrating and balancing renewable energy resources becomes easier when managed over larger geographic footprints. Finally, the report concluded that organized wholesale markets lowered the costs of other decarbonization pathways studies.<sup>5</sup>
- The *Designing the 21st Century Electricity System* report provides a roadmap of high-impact recommendations for large energy customers developed through a meta-study of existing studies. This study demonstrates why regional coordination is a top priority for large energy customers and provides customer centric recommendations on key market issues such as RTO governance, market design, market monitoring and resource adequacy.

<sup>5</sup> [https://cebi.org/wp-content/uploads/2020/05/Renewable-Energy-Policy-Pathways-Report-One-Pager\\_2020-05-05.pdf](https://cebi.org/wp-content/uploads/2020/05/Renewable-Energy-Policy-Pathways-Report-One-Pager_2020-05-05.pdf)

- The *Pathways Toward Grid Decarbonization: Impacts and Opportunities for Energy Customers from Several U.S. Decarbonization Approaches* report analyzes pathways that would optimize power sector decarbonization and the impacts of those pathways on customers' access to clean energy. The study noted that expansion of competition among electricity generators via expansion of Organized Wholesale Electricity Markets (OWMs) to the parts of the U.S. that do not currently have them can provide an estimated cost savings around \$11 billion dollars per year in 2035 and \$14 billion dollars in 2050.

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

As the study team reviews studies currently listed or those added in the next round of comments, CEBA encourages the study team to maintain a focus on studies that address wholesale market coordination and the benefits it provides. For example, *Regulation and Markets: Ideas for Solving the Identity Crisis* provides some commentary relevant to maximizing customer savings and resource diversity, noting "States using the Joint Dispatch Market Model have a number of other advantages for consumers. In addition to maintaining control and transparent decision making around resource decisions, they have access to broader regional resources for cost effective joint dispatch."<sup>6</sup> However, the paper highlights several regulatory constructs or issues not relevant to the aims of ACR-188, such as the Restructured Administrative Market Model.

CEBA appreciates the opportunity for stakeholders to provide feedback and inputs early in the process and believes this practice will improve the final study's outcome aimed at improving regional cooperation.

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<sup>6</sup> [https://www.wbklaw.com/uploads/file/Articles-%20News/2017%20articles%20publications/Market%20Identity%20Crisis%20Final%20\(7-14-17\).pdf](https://www.wbklaw.com/uploads/file/Articles-%20News/2017%20articles%20publications/Market%20Identity%20Crisis%20Final%20(7-14-17).pdf)  
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