Stakeholder Comments Template

Market Seams Workshop

This template has been created for submission of stakeholder comments on the Market Seams Workshop that was held on July 31, 2026. The Stakeholder meeting presentation and other information related to this initiative may be found on the webpage at: westernenergymarkets.com/meetings-events/topics/market-seams

Upon completion of this template, please submit it to ISOStakeholderAffairs@caiso.com.

Submissions are requested by close of business on **August 14, 2026**

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

The Energy Authority (TEA) strongly supports efforts to identify and address inefficiencies in Western Markets and applauds CAISO for getting this work underway.

In its role as an active powermarketer helping to secure least-cost supply for public power load-serving entities across the West, TEA deals with market seams every hour of every day. We move power across the CAISO intertie market seam, navigate the many OATTs in the West, consider limitations imposed by WEIM and EDAM rules when transacting with entities in those markets, conform to RA, GHG, and RPS policies of various jurisdictions, manage timing mismatches with the natural-gas trading cycle, weigh price formation and product-code differences across markets, and respond to unscheduled flow mitigation directives – among the many many other challenging sources of friction or disconnect in western power markets. In short, overcoming all seams great and small is what we – and other powermarketers in the West – do 24/7, 365. Given that, we have not viewed the changes in Western market seams arising from the reconfiguration of day-ahead trading as an existential problem or threat to reliability or market efficiency. For TEA, the new seams are simply a different form of the existing ones. They come with both benefits and challenges. And in our experience, they are manageable.

From that standpoint, our interest in any seams conversations and forums to date has been in working across sectors to identify near-term, practical enhancements both Western market operators could make to their business practices and/or Tariffs to smooth new sources of transactional friction, reduce the need for risk premiums, and support the most critical and beneficial aspects of interregional trading. We have advocated in both CAISO’s and SPP’s stakeholder processes for this work to happen as soon as possible, ideally with as much coordination as possible. And we have looked for (and at times found) ways to bring seams considerations to existing initiatives and workstreams across all Western markets – CAISO’s full-market and EDAM, and SPP’s RTO-Expansion and Markets+ – in advance of a formal market-to-market seams initiative.

It should come as no surprise then that overall we found the kickoff to the Market Seams Workshop series to hit the mark as a great starting point for future discussions. The framing of the issues at a high level landed well and CAISO’s stated principles for seams-work appear to be placing appropriate guardrails on the effort at this stage. Likewise, the panelists provided a useful review of lessons-learned from RTO/ISO seams-management mis-steps in the Eastern Interconnect and their cautioning against certain approaches definitely resonated with our experience as an entity that transacts across all energy markets in North America.

While TEA would like to see a firm commitment to use this process to drive near-term solutions and prioritize identifying and addressing the most critical current and future seams where possible, we recognize CAISO is not there yet in the process. TEA trusts that as we get through the targeted sessions being scheduled around Transmission/Reliability- and Powermarketing-related considerations, the CAISO will be in a better place to figure out the next right steps with stakeholders and chart a path forward.

TEA is also highly encouraged by CAISO’s and SPP’s announcement just this week that future meetings will be “joint”. We have observed a very positive spirit of collaboration growing among stakeholders in the West and are highly optimistic that by working together, we can leverage the presence of multiple markets into building a more resilient Western grid capable of meeting our region’s most pressing challenges.

We very much look forward to continuing to engage with CAISO, SPP, and Western stakeholders to that end through this effort.