Comments on the Market Seams Workshop - July 31, 2026

Department of Market Monitoring

August 14, 2026

Comments

DMM appreciates the opportunity to comment on the July 31 *Market Seams Workshop*.[1] As the independent market monitor for the extended day-ahead market (EDAM) and the Western Energy Imbalance Market (WEIM), DMM recognizes the important role market monitors on both sides of a market seam will play in providing transparency for market participants and regulators, and in monitoring for potential gaming and market power. DMM views the development of seams agreements across the West as an issue appropriately taken up by the parties involved. DMM looks forward to participating in the seams workshop series and will consider and comment on efficiency, gaming, and market power implications of any such agreements or framework.

Presenters and panelists in the first workshop highlighted the importance of managing seams between markets to maintain system reliability, market access, and avoiding impediments to efficient trading. As discussed in the workshop, seams management in the western markets should incorporate lessons from the experience of seams issues from the markets to the east. As an example, stakeholders might consider developing procedures beforehand for updating flow entitlements on an ongoing basis rather than allowing entitlements to become decades out of date. This would address stakeholder concerns that any flow entitlement would become insufficient or outdated as flows change and markets evolve on the western grid.

Another important matter raised in the workshop is coordination of market monitoring across seams. DMM agrees with the importance of this issue, and DMM stands ready to coordinate with the staff of SPP's market monitoring unit for SPP RTO West and Markets + to ensure effective cross-seam monitoring.

Finally, DMM notes that the ISO and SPP, as the market operators for the developing western markets, should establish processes for sharing relevant data with the monitor of the market across their seams. This data sharing should be automatic and timely, and data should be sufficient to facilitate collaboration among market monitors and monitoring of transactions across seams. Timely data sharing will be essential for monitoring across market seams. DMM raises this issue now to ensure sufficient time for discussion and to develop any needed processes or complete any needed tariff changes before the go-live of Markets + or further expansion of EDAM or SPP RTO West.

[1] *Market Seams Workshop*, California ISO, July 31, 2026: https://www.caiso.com/documents/presentation-market-seams-workshop-jul-31-2026.pdf