

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Western Seams Coordination

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Docket No. AD26-10-000

**JOINT COMMENTS OF THE INDEPENDENT MARKET MONITORS FOR THE
EXTENDED DAY-AHEAD MARKET, WESTERN ENERGY IMBALANCE MARKET,
MARKETS+, AND SPP RTO**

The Department of Market Monitoring of the California Independent System Operator Corporation ("DMM"), as independent market monitor for the Extended Day-Ahead Market and the Western Energy Imbalance Market, and the Market Monitoring Unit (MMU) of Southwest Power Pool (SPP), as independent market monitor for Markets+ and the western expansion of the SPP regional transmission organization (RTO), (collectively, the "Market Monitors"), submit these joint comments in the above-captioned proceeding involving the SPP and California ISO (together, the "Market Operators") joint report on market seams coordination.¹

I. COMMENTS

In the Joint Report, the Market Operators update the Commission on the progress regarding management of seams issues between the expanded SPP RTO, Markets+, Extended Day-Ahead Market, and Western Energy Imbalance Market. The Market Monitors note that while the Joint Report highlights the management of many of the

¹ Western Seams Coordination, *Joint Report of California Independent System Operator Corporation and Southwest Power Pool, Inc.*, Docket No. AD26-10-000 (Sept. 30, 2026) (Joint Report).

reliability aspects of seams in the west, many of the specific details of the management of market seams issues will require future development.

Market monitoring across market seams is not addressed in the Joint Report but is an issue that the Market Monitors expect to address as the seams coordination process moves forward. The Market Monitors have been working independently to monitor the existing and future seams in the west, and acknowledge that the need for monitoring across market seams has been noted recently in various forums by utility regulators in multiple western states, as well as contemplated by the Commission. The Commission has emphasized proactive coordination at the seams, and communication and coordination between Market Monitors is a natural extension of that effort. Effective monitoring of each market will, at times, benefit from information about activity in adjacent markets. To support this, the Market Monitors anticipate that tariff provisions enabling data sharing between the Market Monitors, along with an established data-sharing process, will be needed.

While each of the Market Monitors will independently monitor their respective markets, effective cross-seams market monitoring will also depend on the working relationship established between the market monitors of each market. The Market Monitors understand that the nature of this working relationship may be shaped at least partially through ongoing stakeholder discussions in future seams coordination working group meetings. The Market Monitors encourage timely discussion of this topic in such meetings with stakeholder representatives from all markets.

A. DATA SHARING FOR MONITORING ACROSS MARKET SEAMS

The Joint Report included important discussions on the necessary data sharing between the Market Operators to reliably and efficiently manage the grid. The Market Monitors will also need periodic access to data across market seams to facilitate effective monitoring of the markets under their individual purview.

The Market Operators will play a necessary role in facilitating the sharing of data between the Market Monitors, by facilitating any needed tariff revisions, process documentation, and information technology processes. As such, the Market Operators should support further discussion in their seams coordination working group meetings on the development of a well-documented and established process for sharing of the data necessary to monitor activity across the markets with the Market Monitors. Specifically, the Market Monitors would ultimately seek to establish the following:

- (1) Tariff authority, in all applicable tariffs, for the Market Monitors to request and obtain data for use in monitoring and investigations without the condition of notification to the market participant that data is shared between Market Monitors, in order to protect the integrity of ongoing reviews.
- (2) An established, clearly documented process for the Market Monitors to collect data from each other or the Market Operators, as needed to support monitoring, investigations, and the duty of the Market Monitors to identify market design inefficiencies. Such a process would be streamlined to produce data quickly using a pre-determined format and procedure. The process would also include establishment of appropriate confidentiality agreements to be executed by the Market Monitors.

Because information technology and documentation of processes take time to develop, the Market Monitors recommend beginning to work with the Market Operators on these arrangements in the near term in the seams coordination working group meetings. Starting soon is essential to develop any tariff revisions needed to facilitate sharing data between the Market Monitors, and time will be needed to scope, plan, and implement the information technology processes necessary to securely transfer data.

B. DEFINING THE WORKING RELATIONSHIP BETWEEN MARKET MONITORS

While seams have existed across the West for decades, only recently have there been multiple organized wholesale markets with independent market monitors. The presence of independent market monitors on all sides of new market seams presents new opportunities for strengthened monitoring of market transactions and market outcomes.

Each Market Monitor will continue to monitor its own market independently. The Market Monitors also expect to consult with each other periodically to share data, information, and observations about market outcomes near the seams or to coordinate on questions involving both markets. Therefore, in addition to the data sharing needs noted above, effective cross-market monitoring will also be facilitated by a healthy working relationship between the Market Monitors. The Market Monitors understand that regulators in several western states have expressed support for market monitor

participation in seams discussions, and monitoring across market seams that may lie within or impact their jurisdictional footprint.²

While the need for such a relationship is apparent, the exact details of what that relationship will look like going forward are yet to be determined. The Market Monitors expect that the nature of this relationship will be shaped in large part through stakeholder discussions in future market seams coordination working group meetings.

The Market Monitors envision developing the terms of their working relationship directly with each other, consistent with their independence. Progress will be shared through the seams coordination working group process and the Market Monitors look forward to input from stakeholders and the Market Operators. The Market Monitors look forward to these discussions and to solidifying the terms of an ongoing working relationship to ensure robust monitoring of all organized western markets.

II. CONCLUSION

The Market Monitors appreciate the opportunity to update the Commission on their efforts and respectfully request that the Commission afford due consideration to these comments as it evaluates the seams coordination in the West.

² For example, such indications were part of the discussion in *Market Seams Workshop – Regulator Panel Discussion*, California ISO and Southwest Power Pool, July 31, 2026: <https://youtu.be/Vqa0peCDbR0>. The Market Monitors also understand numerous state regulators have expressed interest in market monitoring across seams in other forums.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 30th day of October, 2026.

/s/ Aprille Girardot

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