

October 23, 2025

Western Energy Market Governing Body:

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CAISO Board of Governors:

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Dear Western Energy Market Governing Body and ISO Board of Governors,

PacifiCorp appreciates the opportunity to provide written comments to the Western Energy Market (WEM) Governing Body and CAISO Board of Governors for the October 2025 meetings. Overall, PacifiCorp is pleased with progress being made in all of the ongoing initiatives. PacifiCorp believes CAISO staff have been receptive to stakeholder feedback to craft policy while also meeting the CAISO's goals for equitable electricity markets. PacifiCorp has also appreciated the CAISO's focus on education within stakeholder initiatives to ensure a common understanding of the topic at hand so that stakeholders begin policy discussions from a common understanding of the topic. PacifiCorp would like to specifically highlight the Company's experience in the Gas Resource Management and Greenhouse Gas Coordination initiatives.

Prior to the formation of the gas resource working group, PacifiCorp and other stakeholders brought forward the difficulty of gas resource management at the June 21, 2023, Regional Issues Forum meeting. The Gas Resource Management initiative was subsequently launched in July 2023. While it has taken a considerable amount of time and effort on behalf of the CAISO staff and stakeholders, PacifiCorp believes the proposals in the Draft Final Proposal address many of the issues identified at the RIF meeting. A key topic discussed throughout the working group was the misalignment of the gas and power trading timelines, which currently pose challenges in the Western Energy Imbalance Market (WEIM) and will in the Extended Day-Ahead Market (EDAM). In initiative meetings, CAISO staff shared their past experiences of attempting to, albeit unsuccessfully, align the gas and power trading timelines. Instead of attempting to find a policy solution that has not worked in the past, the CAISO committed to providing gas resource scheduling coordinators with advisory information from electricity market runs that look multiple days in advance. PacifiCorp had asked for advisory schedules for multiple days in advance, specifically four days ahead, because it would give gas traders another piece of valuable information when making gas procurement decisions, particularly over weekends. PacifiCorp is supportive of the CAISO's proposal to improve gas procurement decisions and believes it addresses a key concern that the Company has grappled with as it gets ready for EDAM. While more is needed to help ensure that the inputs to the advisory market runs are accurate, PacifiCorp believes the design will help alleviate a key challenge PacifiCorp foresaw joining the EDAM.



PacifiCorp participated through the entirety of the Greenhouse Gas (GHG) Coordination Working Group alongside fellow stakeholders since the fall of 2023. Throughout the working group process, stakeholders presented numerous aspects of GHG accounting and compliance requirements. This provided the stakeholder community with insight into the various hurdles market participants face as the industry meets clean energy compliance targets. As acknowledged throughout the working group, there's not a current mechanism to signal to the market its willingness to purchase clean energy for states without a price-based program like cap-and-trade. PacifiCorp supports an out-of-market accounting framework as a suitable approach to help market participants access clean energy without disrupting market price formation.

From PacifiCorp's perspective, an overarching goal of the initiative was to evaluate the static emissions rate of the market and refine it to better reflect the current generation fleet within the EDAM. The proposal went through several iterations that were vetted by regulators, market participants, and other interested stakeholders that represented a variety of states. PacifiCorp is supportive of the GHG working group's final proposal and believes that once regulators allow for its implementation in utility reporting, affected states, participants, and customers will benefit from the framework developed.

PacifiCorp specifically highlighted its experience in the Gas Resource Management and Greenhouse Gas Coordination initiatives as the Company believes their success shows the CAISO stakeholder process is moving policy forward. PacifiCorp commends CAISO staff for thoughtfully integrating stakeholder feedback with their own operational expertise to craft policy enhancements that will continue to strengthen both the EDAM and WEIM. PacifiCorp appreciates the opportunity to share its experience with the WEM Governing Body and looks forward to continuing to engage in the important ongoing initiatives.

Regards,

Michael Wilding

Vice President, Energy Supply Management