



Western Power Trading Forum (WPTF)
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CAISO Board of Governors:
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Jan Schori
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WEIM Governing Body:
Robert Kondziolka
Rebecca Wagner
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Anita Decker
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Dear CAISO Board of Governors and WEIM Governing Body Members,

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules, open access transmission, and transparency to facilitate transactions among market participants. The membership of WPTF includes load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

WPTF supports adoption of the Greenhouse Gas (GHG) Accounting and Reporting Approach, as described in the CAISO's final proposal. This approach represents a significant step forward in the tracking of accurate GHG emissions associated with serving retail electric load. The collection and provision of this data will be important for load serving entities that are covered under state load-based GHG reduction regulations, as well as those entities with voluntary GHG reduction goals. Importantly, because the approach operates after the SCED, it aligns the allocation of energy and emissions from owned and contracted generation to the dispatch of those resources. It also ensures that load-based GHG accounting is consistent with and does not conflict with market attribution of energy and any associated emissions to the state GHG pricing programs.

The innovative framework will provide accurate emission factors for residual market energy -- that is energy that is not claimed by market participants using the GHG Accounting and Reporting Approach or attributed to the state GHG pricing programs -- on an hourly basis. This is a significant improvement on the CAISO current provision of averaged emission factors for the entire market footprint. This data will be valuable to both non-governmental organizations and the public broadly and is likely to become increasingly important in light of the pending dismantling of reporting and compilation of electricity related GHG data at the federal level.

The data provided by the GHG Accounting and Reporting Approach may also be of use in other types of clean energy programs. For instance, under the Low Carbon Fuel Standards of California, Oregon and Washington, various protocols for calculating the emission rate associated with the production of renewable fuels requires use of an emission factor for grid-sourced electricity. Rather than having to rely on static, annually-averaged emission factors for specific geographic regions, the GHG Accounting and Reporting Approach will enable the use of accurate hourly emission factor that reflects the time of actual electricity consumption.

The flexibility inherent in CAISO final proposal is an important feature. While WPTF believes that harmonization of state climate and clean energy programs is a laudable goal in the longer term, the current divergence in these policies results in fundamental inconsistencies in how clean energy and associated emissions are accounted. It is therefore essential that the GHG Accounting proposal can accommodate the diversity of state programs. It was also equally important that the GHG accounting framework does not burden market participants and states without GHG goals or programs in any way.

While we disagree with one aspect of the final proposal, namely the provision for voluntary designation of null power, we recognize that this element is a necessary compromise to reconcile the divergent policies regarding the role that renewable energy credit (REC) procurement plays in clean energy accounting. The final proposal carefully and appropriately accommodates these different perspectives, without imposing a policy.

In conclusion, WPTF believes that the CAISO's proposed GHG Accounting and Reporting Framework represents a significant improvement in the provision of GHG data at the load-serving entity, state and market footprint level and will support efforts to reduce GHG emissions from the electric sector. For these reasons, we urge the members of the CAISO Board of Governors and WEIM Governing Body to approve its adoption.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Miller", with a stylized flourish at the end.

Scott Miller, Executive Director
Western Power Trading Forum
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