



August 6, 2026

To: RA Sponsors and Work Group
resourceadequacy@rowesternenergy.org

From: Renewable Northwest
Interwest Energy Alliance
Natural Resources Defense Council
Western Resource Advocates
Northwest Energy Coalition
Montana Environmental Information Center

Re: Comments of Joint Clean Energy and Environmental Parties on the
Extended Day-Ahead Market Resource Adequacy Program July Workshops

On behalf of Renewable Northwest ("RNW"), Interwest Energy alliance ("Interwest"), the Natural Resources Defense Council ("NRDC"), Western Resource Advocates ("WRA"), the Northwest Energy Coalition ("NWECA"), and the Montana Environmental Information Center ("MEIC"), collectively, "Joint Clean Energy and Environmental Parties" or "Joint Parties", please accept these comments on the RA Sponsors' July Workshops as directed at the June 25, 2026 workshop. These comments cover the June 25, July 9, July 16, and July 23 workshops and focus on the Revised Foundational Principles and the discussion of transmission requirements.

Joint Parties remain supportive of the formation of a Resource Adequacy ("RA") program for Extended Day-Ahead Market ("EDAM") participants, referred to hereafter as the "EDAM RA Program", and appreciate the continued efforts of the RA Sponsors and Working Group in the development of the program and the coordination of workshops. Joint Parties wish to express their appreciation for the evolution of the Summer workshops to include more diverse

perspectives, more detailed engagement with key topics, and more time for dialogue within the workshops. We look forward to further discussion at upcoming workshops.

I. Revised Foundational Principle #10: Data Transparency

Joint Parties recognize the addition of Principles 10 and 11¹, regarding data transparency and governance, respectively, as intended to be responsive to concerns raised by the Joint Parties (among others) in their comments on the Spring Workshops.

Joint Parties appreciate the inclusion of Principle 10 regarding transparent reporting and data availability, which states: “Balance the need for transparent reporting and data availability with confidentiality and preservation of market integrity.” While this Principle is directionally aligned with stakeholder feedback, Joint Parties recommend reframing the principle to affirmatively support data transparency as a key element of the RA Program.

While the RA Program can provide benefits in compliance and operational time horizon, the lion's share of potential benefits are in the role the program can play in informing planning and procurement decisions years ahead of compliance showings. These planning and procurement decisions - in utility resource plans, regional transmission studies, and resource developer investments - can only be achieved through a high degree of data transparency. While transparency varies across peer RA programs, the ability to provide robust, transparent data without compromising market sensitive information has been demonstrated extensively in other regions, and should be a core goal of the RA Sponsors.

Joint Parties recommend the following modification to reframe the principle towards an affirmative commitment to data transparency:

10. Ensure sufficiently transparent and robust data availability to inform planning and procurement decisions while preserving confidentiality and market sensitivity.

Joint Parties look forward to further discussion of data access at the September 17 workshop.

II. Revised Foundational Principle #11: Governance

Joint Parties recognize the addition of Principle 11, regarding the differential stature of participants and non-participants in governance, as a response to Joint Parties' concerns that participants have established an elevated governance role for buyers which relegates non-buyers, including regulators, other market participants, and public interest organizations, as external stakeholders which may provide comment but which have no participation in or influence over the decision-making process.

¹ EDAM RA Foundational Principles (Revised), https://rowesternenergy.org/wp-content/uploads/2026/07/Revised-Foundational-Principles_Final-07162026.pdf

Specifically, the added Principle 11 states the following: “Adhere to transparent practices with opportunities for meaningful stakeholder input by all entities impacted by the program, while respecting the unique responsibilities of entities with compliance obligations.”

The language in Principle 11 is ambiguous, but appears to reiterate the two-tiered power dynamic in its framing of transparency and opportunity for input for stakeholders contrasted against an elevated status for “entities with compliance obligations.” It is unclear whether the latter phrase intends to reflect the broader universe of entities with compliance obligations, including generators subject to Must Offer Obligations or other requirements; regardless, it seems intended to exclude other sectors.

Joint Parties wish to reiterate the concerns raised in opening comments² regarding the lack of any clear precedent for the establishment of an RA program or capacity market in which buyers are the sole determinants of program rules and program design. Joint Parties noted how significantly this diverges from all Independent System Operator (“ISO”) governance structures as well as the Western Resource Adequacy Program (“WRAP”), and also diverges considerably from the emerging governance structures for the Regional Organization for Western Energy (“ROWE”).

To date, Joint Parties have not received a response or rationale from the RA Sponsors which justifies the stark departure in precedent in establishing the buyers as the sole determinants of program design. It is unclear why the RA Sponsors are opposed to the inclusion of other market participants, regulators, or public interest organizations in the development of the program, as these sectors can provide valuable technical and policy input to ensure a robust and effective program design.

At the July 16 Workshop, RA Sponsors indicated that their intent is to follow the principles under the ROWE proposal wherever possible. Joint Parties note that the ROWE’s *Principles of the Stakeholder Process* include a specific prohibition on a stakeholder process which establishes unequal representation for any individual sector, as presented at the July 9 stakeholder workshop³:

“d. Fair balance of interests - not dominated by a small number of sectors, and respect for minority positions”

Joint Parties recommend the following modification to reframe the principle towards an affirmative commitment to equal status reflecting the ROWE principle above:

11. Ensure fair representation of interests in all stages of the design and governance process through equal access to participation and decision-making across sectors.

² Consolidated Stakeholder Comments on Spring Workshops, p. 56-59; https://rowesternenergy.org/wp-content/uploads/2026/06/Consolidated-Spring-Workshop-Comments_06222026.pdf

³ July 9, 2026 EDAM RA Workshop, Slide 13 https://rowesternenergy.org/wp-content/uploads/2026/07/RA-Workshop-7_Final.pdf

This change should be accompanied by an evolution of the Technical Oversight Committee to include representatives from other sectors, including other market participants, public interest organizations, and regulators.

While Joint Parties appreciate the thought leadership of the RA Sponsors, the commitment with which the RA Sponsors have opposed inclusion of non-participant stakeholders in decision-making risks eroding the trust and support being offered by non-participants, including the organizations represented among Joint Parties. We encourage the RA Sponsors to reconsider this position.

III. Transmission Rights Requirements

Joint Parties appreciate the continued focus on the transmission element of the RA Program design and appreciated the presentations and discussion at the July 23 workshop. Addressing physical transmission constraints and establishing a robust transmission and deliverability framework within the ROWE are key long-term goals supported by Joint Parties.

Joint Parties strongly support further investigation of constraint-based or zone-based deliverability, including the options presented during the July 23 workshop⁴. While deliverability is critical, strict enforcement of transmission rights requirements adds a considerable layer of friction into a bilateral RA market which may already face limited liquidity and other challenges, especially during its formative years. Joint Parties support continued evaluation of the parallel transmission functions within EDAM as a complementary feature which may mitigate the need for strict transmission rights requirements to be held by participants in parallel with their resource showings.

Joint Parties look forward to further discussion of potential transmission solutions at upcoming workshops.

IV. Conclusion

Joint Parties appreciate the opportunity to provide feedback to the RA Sponsors and Working Group and look forward to continued collaboration on this initiative moving forward.

Sincerely,

Joint Clean Energy and Environmental Parties

⁴ July 23, 2026 EDAM RA Workshop, Slides 4-5. https://rowesternenergy.org/wp-content/uploads/2026/07/Workshop-9_Final.pdf

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