



September 29, 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
Regional Resource Adequacy Program Summer 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 Regional Resource Adequacy ("Regional RA") Summer Workshops as directed at the September 17, 2026 workshop¹. These comments provide both specific feedback on issues discussed at the August and September workshops as well as overarching feedback on the current Regional RA proposal to inform the Initial Draft Proposal.

Joint Parties support the creation of a Resource Adequacy ("RA") program for Extended Day-Ahead Market ("EDAM") participants and appreciate the efforts of the RA Sponsors and Working Group to develop and bring forward a cohesive proposal for consideration by the Regional Organization for Western Energy ("ROWE"). Joint Parties are supportive of many

¹ <https://youtu.be/miQugPPz3jM?si=HtnLR115TZWoAOtN&t=7695>

elements of the proposed framework and are encouraged by significant progress made over Summer Workshops on program design, while recognizing many key details remain to be developed.

In developing perspectives and offering recommendations, Joint Parties have sought to align their policy positions with the breadth of precedent, industry norms, and governance standards currently in use in RA programs and capacity markets across the country. This includes a strong emphasis on the precedents and legal standards applicable to decision-making of Independent System Operators (“ISOs”) in reviewing and approving tariffs through the authority granted them by the Federal Energy Regulatory Commission (“FERC”). In this vein, Joint Parties make several recommendations to better align the program with generally accepted norms for program design and governance.

In these comments, Joint Parties offer support for key program design elements while offering several recommendations for the Initial Draft Proposal:

- **Support for Key Elements:** Joint Parties support key elements of the RA framework and encourage RA Sponsors and Working Group to continue its development.
- **Effective Analytics and Reporting:** Establish a clear framework for analysis and reporting necessary to fulfill the significant value proposition offered by the program.
- **Equal Standing Among Stakeholders:** Restructure the Technical Review Committee to include formal, equal representation from non-utility stakeholders to align with longstanding independence requirements established under FERC Order 2000.
- **Closed Sessions:** Revise or remove the proposal for closed sessions of the TRC on policy and market issues to align with standard practice limiting closed session to items related to personnel, litigation, and security-sensitive issues.
- **Transmission:** Continue development of the proposed constrained and secondary paths methodology while further assessing alternate pathways to facilitate regional trading.
- **Accreditation:** Continue development of the proposed study and accreditation framework presented by CAISO staff, with recommendations outlined below.
- **Year-Ahead Showings:** Formalize the requirement for forward showings in the year-ahead timeframe and further investigate opportunities to integrate more forward requirements and/or informational data supporting long-term planning and investment.

I. Joint Parties Support the RA Initiative and Support Many Elements of the Proposal

Joint Parties wish to reiterate their strong support for the development of the Regional RA framework, as discussed at length in Joint Parties’ comments on Spring Workshops². Establishing an RA program to augment the Extended Day Ahead Market (“EDAM”) has the potential to provide a critical linkage between participant long-run planning and procurement efforts and participation in markets in the operational timeframe. The proposal has the potential to standardize and formalize RA requirements across the region, facilitating lower reserve

² [Comments of Joint Clean Energy and Environmental Parties on the Extended Day- Ahead Market Resource Adequacy Work Group Initial Draft Proposal](#), p. 53

margins through aggregated reliability planning and establishing more structured, transactable products to meet defined requirements. Joint Parties note that the lack of a structured, regional RA program contributes to significant gaps in participant and regulator situational awareness regarding near- and long-term reliability needs, representing a major source of planning and procurement uncertainty across participant resource plans.

Joint Parties are supportive of key features of the Regional RA program and wish to emphasize the value of aligning key program design elements with the neighboring CAISO and Western Regional Adequacy Program designs, including the adoption of similar accreditation structures and alignment in showing periods. As discussed below, Joint Parties are supportive of efforts to minimize friction caused by transmission rights requirements.

Joint Parties note that several areas of program design appear to reflect an intent to incorporate transitional elements intended to soften requirements, including the use of unspecified import resources from neighboring regions and softened penalty structures during the “on-boarding” period. In bringing forward the Initial Draft Proposal, Joint Parties recommend further articulation of which elements are reflective of this transitional dynamic and to bring forward perspectives from participants on the potential future state of program design under a mature RA program.

Joint Parties recognize that there are considerable details left to be developed, including significant efforts to bring forward a robust, reviewed study framework, translating high-level concepts presented in the Summer Workshops into well-defined workplans. Joint Parties look forward to participating in this future development, and, as discussed in Section III, encourage RA Sponsors to clarify and refine the proposed participation structure for non-participant stakeholders.

II. Achieving Value Proposition Through Effective Analytics and Reporting

Joint Parties wish to emphasize the importance of continued development of data transparency and reporting as a key element of the program’s value proposition for both participants and policymakers. Specifically, much of the promise of a regional RA program is in providing clear, quantitative data to be incorporated into participants’ long-term planning structures and the use of that data to identify and engage in resource procurement necessary to close gaps.

Specifically, Joint Parties wish to call out minimum features of the data reporting process to achieve the program’s intended benefits:

- **Modeling Datasets:** Integrated datasets reflecting current and expected resources, load, and transmission within the Regional RA footprint, preferably released as an integrated modeling package.
 - Integrated data identifying existing and planned generating and storage resources within the RA region footprint³

³ See, e.g. [CAISO Net Qualifying Capacity List](#)

- Integrated data identifying load forecasts for participants at or below the Balancing Authority level
- Transmission topology utilized within the RA program model
- **Modeling Outputs:** Quantitative data identifying loss of load metrics and accreditation results.
 - Standardized metrics identifying frequency, magnitude, location, depth, and periods of loss of load as assessed in the program model
 - Accreditation results for specific resource categories as assessed in the program model

Providing these data resources as public, integrated datasets is a critical step in the maturation of the RA program, and it can be provided without compromising any commercially sensitive participant-level data. Providing holistic datasets allows participants to effectively integrate key program modeling inputs and results into participant resource planning models and allows for robust stakeholder review to ensure accurate modeling. Joint Parties look forward to further development of the data reporting framework.

III. Clarify and Refine the Proposed Structure for Stakeholder Participation in Program Design and Governance Consistent with Industry Norms and FERC Standards

Joint Parties appreciate the efforts of the RA Sponsors and Working Group to further refine the program governance framework, proposing the *Regional Resource Adequacy Governance Update*⁴ (“Governance Update”) at the September 3, 2026 workshop. The Governance Update makes several changes to the proposed governance structure, including establishing the ROWE Stakeholder process as the venue for tariff changes, committing to open meetings of the Technical Review Committee (“TRC”) as the “presumption”, establishing a working group process which could include non-participants in addition to participants on the TRC, and establishing the CAISO Department of Market Monitoring as the Program Assessor⁵.

Under this framework, Business Practice Manual (“BPM”) proposals would be “spearheaded by Program Coordinator staff and the TRC”⁶, with non-participants eligible to participate in working groups but unable to participate in voting or decision-making as non-members of the TRC. BPMs are critical program implementation processes which implement existing tariffs and often intersect with potential or proposed tariff changes. BPMs are significant, often extensive documents implementing myriad policy design choices below the level of detail included in tariff design, with wide-ranging implications for non-LSE market participants and other stakeholders. As an example, WRAP has twenty-four BPMs⁷ providing detailed implementation of showing requirements, obligations on participating resources, accreditation values, penalties, settlements, governance, workplan, and confidentiality, among many other topics.

⁴ https://rowesternenergy.org/wp-content/uploads/2026/09/Regional-RA-Governance_FINAL.pdf

⁵ P. 2, https://rowesternenergy.org/wp-content/uploads/2026/09/Regional-RA-Governance_FINAL.pdf

⁶ P. 4, https://rowesternenergy.org/wp-content/uploads/2026/09/Regional-RA-Governance_FINAL.pdf

⁷ https://www.westernpowerpool.org/resources/wrap_bpms/

Joint Parties appreciate these efforts to further the proposed governance structure and appreciate the inclusion of working groups including non-participants for the BPM process. Joint Parties encourage further refinement and clarification of this process to align with industry norms and FERC standards for peer RA programs and capacity markets. Specifically, Joint Parties note that the proposal to establish a TRC comprised solely of one sector, load-serving entities, is inconsistent with both industry norms and governance standards established by FERC. Additionally, the establishment of a closed session framework in which confidential or market-sensitive data could be shared with one sector, again, load-serving entities, raises significant concerns. Discussion of the closed session framework is included in Section IV.

As discussed in Joint Parties' June and August comments, Joint Parties are concerned that the proposed governance structure remains defined by a two-tiered structure in which buyers ("participants") are the sole representatives within a group charged with core program design elements. This framework lacks any clear precedent in other policy design structures regulated by FERC and fails to adhere to the established foundational principles of the ROWE as presented at the July 9, 2026 Regional RA workshop⁸. This framework is highly unusual, with no clear parallels in any other regional RA program or capacity market. The framework would create a one-sided power dynamic in which buyers alone set program rules without equal - or even substantive - participation by other market participants or public input organizations. Non-buyer participants, including market participants which have significant economic interest in the design and success of a future RA Program, are relegated to participating as members of a non-voting working group process or providing public comment to a panel of decision-makers with a unique and relatively monolithic set of interests.

Joint Parties reiterate here the concerns raised in their June 11⁹ and August 6¹⁰ comments: the establishment of a primary policy development body in which only buyers have representation has no clear precedent and cannot be easily rationalized. Joint Parties presented a range of examples from other RA governance constructs which reflect the widely held precedent of equal standing of parties in governing bodies for FERC-jurisdictional RA programs¹¹. These examples included the New England Power Pool, the forum for stakeholder initiatives in ISO-New England, which has broad representation from multiple sectors, including states, consumer advocates, public interest organizations, and independent power producers, the Midcontinent Independent System Operator's Resource Adequacy Subcommittee, an advisory committee reporting to MISO's Board, the CAISO Stakeholder Initiative Process, which is led by professional staff without any formal voting or leadership role of independent parties, and the Western Resource Adequacy Program, whose Program Review Committee ("PRC") includes

⁸ https://rowesternenergy.org/wp-content/uploads/2026/07/RA-Workshop-7_Final.pdf, Slide 13

⁹ https://rowesternenergy.org/wp-content/uploads/2026/06/Consolidated-Spring-Workshop-Comments_06222026.pdf

¹⁰ https://rowesternenergy.org/wp-content/uploads/2026/09/2026_08_06-EDAM-RA-Joint-Clean-Energy-and-Environmental-Parties.pdf

¹¹ https://rowesternenergy.org/wp-content/uploads/2026/06/Consolidated-Spring-Workshop-Comments_06222026.pdf, p. 57-58

intentional representation across sectors. While each of these structures is unique, they share a common principle: equal standing for market participants, Public Interest Organizations, and state policymakers.

This equal standing precedent is also common to other ISO policy design and implementation elements, including energy market design, transmission policy, and other key design considerations. It is unclear what, if anything, differentiates the proposed RA program from other elements of ISO design elements to which no party has special standing or an outsized policy influence.

Joint Parties remain puzzled regarding the potential downsides of including non-utility participants in the policy design process. Non-utility market participants, including clean energy and storage developers represented in this comment submission, bring extensive expertise and insight regarding policy design from other RA programs. Public Interest Organizations, similarly represented, have considerable experience as policy and technical experts in ISO and FERC proceedings across the country.

The exclusion of state regulators from the TRC risks deferring policymaker buy-in on key policy considerations until the process is developed beyond the point of modification. While the Governance Update proposes to include a member of the Body of State Regulators as a liaison, the proposed structure largely leaves state regulators, alongside other key stakeholders, as downstream consumers of proposals developed by the TRC.

The proposed two-tier structure is in clear conflict with the stated principles of the ROWE Stakeholder Process, as presented at the July 9, 2026 Regional RA workshop. Principle (d) states:

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

This framework is further challenged by the Minimum Characteristics of a Regional Transmission Organization as enshrined by FERC in FERC Order 2000¹². The first principle established by FERC is that RTO governance and decision-making shall be “independent of market participants”¹³, stating that:

“As a first required characteristic, the Commission stated that all RTOs must be independent of market participants. To achieve independence, we propose that RTOs must satisfy three conditions. First, the RTO, its employees, and any non-stakeholder directors must not have any financial interests in any market participants. Second, the RTO must have a decision-making process that is independent of control by any market participant or class of participants.”¹⁴

¹² <https://ferc.gov/sites/default/files/2020-06/OrderNo.2000.pdf>, p. 152-153

¹³ P. 152

¹⁴ P. 152

Joint Parties are unable to reconcile the proposed governance structure, the defining feature of which is domination by a single sector and a separate, reduced standing for other sectors, with either ROWE's stated stakeholder process principle nor FERC's clear direction excluding decision-making processes which are not independent of control by a class of participants, in this case, program buyers.

It is unclear on what precedent or authority the RA Sponsors and Working Group view their proposal resting. Joint Parties encourage the RA Sponsors and Working Group to reconsider their proposal and bring forward further revisions which allow for equal standing for all parties.

IV. Further Clarify and Refine the Proposal for TRC Closed Sessions

The Governance Update includes a proposal for a "presumption that TRC meetings... will be open to all stakeholders"¹⁵ while also establishing a framework to disclose "information on market analytics or other issues that may require closed executive sessions of the TRC."¹⁶

Joint Parties are concerned by the open-ended proposal for closed sessions of the TRC, which, like the general two-tiered structure, lacks clear precedent in peer RA programs. Joint Parties understand the intent of the closed sessions to be the discussion of "commercially sensitive issues"¹⁷, which Joint Parties understand may refer to discussion of market performance, prices, positions, or other market-sensitive data. It is unclear what scenario, if any, would support the disclosure of such confidential information to the TRC, a group which will include utilities both buying and selling capacity - in a manner which would not raise both policy and anti-trust concerns.

Joint Parties wish to be very specific with our concern - Joint Parties support confidentiality protections for participants, a key and common feature of market participation across ISO structures and RA programs. The disclosure of market sensitive information should not be a key feature of the governance process. One of the key benefits of the establishment of a Program Assessor is to delegate review, analysis, and reporting on confidential information out to both policymakers and program participants. The CAISO Department of Market Monitoring has been conducting this task effectively for many years for CAISO markets and will be well-suited to providing this service to the Regional RA program.

Joint Parties recommend further clarifying and refining the proposed closed session framework. There should be an explicit standard for closing meetings, and advance notice and an agenda must still be made publicly available. Closed sessions should be limited to confidential information related to personnel, active litigation, or highly narrow security-sensitive information.

V. Joint Parties Support the Constrained and Secondary Transmission Proposal

¹⁵ Governance Update, p. 2

¹⁶ Governance Update, p. 2

¹⁷ https://rowesternenergy.org/wp-content/uploads/2026/09/Regional-RA-Governance_FINAL.pdf, p. 3

At the September 3, 2026 workshop, the RA Sponsors and Working Group released an updated transmission rights framework in the form of the *Transmission Requirement Draft Straw Proposal*¹⁸ ("Transmission Proposal"). The Transmission Proposal progresses the framework for transmission rights requirements and incorporates a significant proposal to bifurcate transmission requirements between requirements for *constrained legs* and *secondary legs*. Joint Parties support the proposed framework and encourage further development.

Joint Parties reiterate concerns raised throughout the design process regarding the challenges of pairing transmission rights requirements with resource showings, an RA program design feature currently unique to the WRAP. As discussed in Joint Parties' initial comments, pairing transmission requirements risks significantly elevating transactional friction in the proposed RA market - one which is already considerably more complex than most Eastern RA programs by virtue of its bilateral, monthly structure. In this vein, Joint Parties reiterate their recommendation to pursue, wherever possible, opportunities to simplify and mitigate transmission requirements.

Joint Parties view the core objective of the proposed Regional RA program as ensuring a sufficient *capacity pool* to support reliability across the EDAM footprint. While local and utility-level reliability are key features of utility planning, and must remain so, their resolution within a market construct like EDAM RA risks introducing considerable friction into a structure intended primarily to ensure, in relatively broad strokes, sufficient capacity at a regional level.

In that context, Joint Parties are supportive of the RA Sponsors and Working Group's proposal to establish tiered requirements for transmission which prioritize more stringent showing requirements on identified constrained transmission paths. CAISO's proposed RA study will be useful in providing preliminary insights regarding constraints at the zonal level¹⁹.

Joint Parties support the proposed two-tier compliance test discussed at the September 17 meeting²⁰ which would permit participants to show generation resources without accompanying transmission rights. While such showings would not adhere to the current transmission rights framework proposal, there are benefits to showing generation resources regardless and incentives should be aligned to do so when feasible.

While Joint Parties support the direction of the proposal, we reiterate our recommendation to further investigate methods to further alleviate transmission rights-related friction. These methods could include further reductions in requirements for secondary legs or the establishment of zonal requirements which ensure each zone is not relying on more resources than can be expected to be delivered. If there are concerns regarding transmission from off-system resources, it may be reasonable to further bifurcate transmission needs between resources which originate on the EDAM footprint and those which do not.

¹⁸ https://rowesternenergy.org/wp-content/uploads/2026/09/Regional-RA-Governance_FINAL.pdf

¹⁹ https://rowesternenergy.org/wp-content/uploads/2026/08/Workshop-10_Final.pdf, Slide 14.

²⁰ https://rowesternenergy.org/wp-content/uploads/2026/09/Workshop-13_Final.pdf

Joint Parties appreciate the continued efforts of the RA Sponsors and Working Group in working through this complex issue.

VI. Comments on CAISO Resource Adequacy Study and Accreditation

At the August 11 Workshop²¹, CAISO Staff presented a preliminary proposal for analysis and potential future accreditation for the Regional RA Program. Joint Parties appreciate and support CAISO's analytical framework and accreditation proposal with recommendations noted below. Joint Parties wish to emphasize their support for the accreditation proposals offered by CAISO, which would provide significant alignment between the Regional RA Program, the CAISO RA Program, and the WRAP, and will support ensuring participants are predictably and effectively credited for long-term capacity investments.

CAISO proposes a two phase analytical framework. The first phase focuses on assessing the reliability of the Regional RA footprint; the second phase focuses on assessing resource accreditation. Both phases would rely on a common modeling ecosystem comprised of data collected by CAISO. CAISO plans to use the PLEXOS modeling ecosystem for its analysis.

Overall, Joint Parties support CAISO's proposed approach to developing its modeling ecosystem. However, Joint Parties note that the exercise proposed by CAISO is significant and complex, and will merit substantial review by participants and stakeholders to ensure data quality and address methodological questions. Joint Parties recommend the publication of a robust Inputs and Assumptions ("I&A") document as well as open access to the CAISO dataset, consistent with CAISO's current practices for its Summer Assessment of the CAISO footprint and other models. This data can be released without compromising any commercial or sensitive technical information, and its release and public benchmarking and review will be invaluable to stakeholders in the launch and ongoing development of the Regional RA program.

Joint Parties appreciate and support CAISO's proposal to align accreditation values, to the extent practicable, with those used in the WRAP and the CAISO Default RA rules. This includes the use of zonal, average ELCC for solar, wind, and storage resources, and the application of an unforced capacity ("UCAP") derate for thermal resources. Joint Parties provide two comments on the accreditation for conventional thermal resources and hydroelectric resources below.

Despite its limitations, the use of an unforced capacity derate for conventional thermal resources is an acceptable near-term solution for program launch given parallel UCAP rules for conventional thermal resources in both WRAP and CAISO, both of which are expected to be implemented by the time the EDAM RA program is launched. However, the application of ELCC for some resources and UCAP for other resources presents analytical integrity and equity issues which should be addressed in the near-term. Specifically, thermal resources, like load and other resource categories, can present significant performance degradation during extreme

²¹ https://rowesternenergy.org/wp-content/uploads/2026/08/Workshop-10_Final.pdf

weather events which is generally not captured in UCAP values, which commonly reflect only the prior 3-5 years of historical data. When planning a system to be reliable under much more extreme weather conditions - 1-in-10 or more severe - UCAP values may diverge significantly on both a unit and system-level basis from expected values aligned with the extreme weather period. Characteristic risks include correlated outages, such as those which occurred simultaneously across many gas and coal units in ERCOT during Winter Storm Uri, fuel scarcity, a significant reliability risk in northern regions with pipeline or storage constraints, and ambient derates, reductions in efficiency which occur during periods of high heat. While these risks can be present in the UCAP history, the structure of UCAP makes it highly unlikely for UCAP to appropriately internalize and weigh these extreme weather conditions. Given that the entire raison d'être of an RA program is to prepare for and mitigate risks driven by extreme weather - including both regional heat domes and extreme winter events within the EDAM footprint - both probabilistic modeling and accreditation must align with these realities.

Hydroelectric accreditation is complex and challenging, and merits further analysis in EDAM and other western RA programs. While hydroelectric resource variability can be simulated in probabilistic models, the wide range of outcomes is challenging to capture in a single expected value for either planning or accreditation purposes. Joint Parties recommend further analysis of the hydroelectric systems implicated in the EDAM footprint as a key area for review of both modeling methodology and accreditation approach.

VII. Comments on Showing Timelines

Joint Parties reiterate their support for Year Ahead showings for generation and storage resources as a key feature of the Regional RA Program, and further reiterate the recommendation to incorporate showings, or at minimum data collection, for periods beyond one year ahead. The purpose of the Regional RA Program is to ensure sufficient resources are available for reliability in the operational time horizon. There are few clear benefits to deferring showings beyond the year-ahead timeframe; more information and greater lead-time provides some additional potential to cure and address deficiencies, though these are best addressed even further upstream given resource development timelines. Joint Parties are not opposed to deferring elements of the showing, such as transmission rights showing or curing of deficiencies, to the Month Ahead timeframe.

VIII. 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,

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