



**The Public Advocates Office's Informal Comments on Regional Resource Adequacy
Workshop #11**

Submitted by	Organization	Date Submitted
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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these informal comments regarding the governance proposals presented at workshop #11 of the Extended Day Ahead Market (EDAM)-aligned resource adequacy (RA) program.¹

Cal Advocates supports the development of a voluntary RA program for EDAM and Regional Organization for Western Energy (ROWE) participants, but as drafted, the proposal does not include appropriate safeguards. To detail these concerns, Cal Advocates provides the following comments:

- The ROWE Board should commit that a ROWE RA program is not treated more favorably than other RA programs.
- The ROWE Board should guard against the RA program becoming de-facto mandatory.
- The ROWE Board should guard against the RA program becoming a

¹ EDAM-aligned RA Sponsors, *Regional Resource Adequacy Workshop #11: Transmission and Governance* (Workshop #11 Slides) at 14-15, September 3, 2026. Available at: https://rowesternenergy.org/wp-content/uploads/2026/09/Workshop-11_Final.pdf.

federally-mandated standard.

- Administrative costs of a ROWE RA program should be allocated to participants.
- Program sponsors should clarify that the “RA Program Sector” will not be added as a formal ROWE sector.

II. DISCUSSION

A. The ROWE Board should commit that a ROWE RA program is not treated more favorably than other RA programs.

Any official ROWE RA program creates the risk that the program will be privileged within ROWE and CAISO decision-making. There are several scenarios that would undermine non-ROWE RA programs and state procurement and reliability policies. These are not necessarily likely, but pose risks to non-ROWE RA programs.

- ROWE could launch an RA backstop program that charges balancing areas for capacity backstop costs, using a reliability basis that imposes the ROWE RA program’s reliability and accreditation standards.²
- ROWE could change the details of the resource sufficiency evaluation (RSE) calculation in ways that favor the ROWE RA program.
- ROWE could create new day-ahead or real-time products that preferentially align with the ROWE RA program over other RA programs.

To address these risks, the ROWE Board should – if it adopts an RA program – commit to equitable and non-preferential treatment between that program and other RA programs within the ROWE footprint.

B. The ROWE Board should guard against the RA program becoming de-facto mandatory.

If the ROWE RA program receives significant preference or privileges relative to other programs, the ROWE RA program may become de-facto mandatory even if all participants technically have a free choice. This situation could arise when the ROWE RA program is

² For example, current CAISO Cost Procurement Mechanism designations are driven by individual and collective deficiencies based on a load-serving entity’s (LSE) RA program (see CAISO Tariff 43A.2). A backstop designated by ROWE on the basis of reliability that uses the reliability standards of the ROWE RA program, or a determination by the ROWE Board itself, would inappropriately override the RA programs and reliability goals of LSEs.

avored by ROWE policy. The ROWE Board should maintain indifference to different RA programs within the market footprint, and to reasonably accommodate different RA programs in alignment with market rules and operations.

C. The ROWE Board should guard against the RA program becoming a federally-mandated standard.

FERC has demonstrated a willingness to intervene in regional RA programs.³ The initial program sponsors have made very clear that they intend the RA program to be voluntary. If the ROWE Board approves an RA program, they should make clear that the existence of the program is conditional in it remaining voluntary to all participants.

D. Administrative costs of a ROWE RA program should be allocated to participants.

The ROWE should allocate the cost of voluntary programs to the program participants and prohibit cost recovery from non-participants.

E. Program sponsors should clarify that the “RA Program Sector” will not be added as a formal ROWE sector.

The Workshop #11 slides mention that the technical review committee “will act as the ‘RA Program Sector’”.⁴ The program sponsors should state explicitly that there will not be an additional RA sector, consistent with the discussions during the workshop. The slides presented were more ambiguous and did not clearly state that this is not a proposal to add a tenth sector on the ROWE Stakeholder Representatives Committee.

III. CONCLUSION

Please contact Karl Dunkle Werner at karl.dunklewerner@cpuc.ca.gov with any questions or input on these comments.

³ Ashurst Perkins Coie, *PJM Proposes Reliability Reset While FERC Questions Its Governance*, May 21, 2026. Available at: <https://www.ashurstperkinscoie.com/en/insights/pjm-proposes-reliability-reset-while-ferc-questions-its-governance/>.

⁴ Workshop #11 Slides at 17.