



California Wind Energy Association

February 7, 2025

California Energy Commission

Docket No. 24-IEPR-01

Docket Office

715 P Street

Sacramento CA 95814

Submitted Electronically via CEC website to Docket 24-IEPR-01

Re: Comments on IEPR Regional Electricity Markets and Coordination Workshop

The California Wind Energy Association (CalWEA) appreciates this opportunity to comment on the January 24, 2025, IEPR Commissioner Workshop on Regional Electricity Markets and Coordination.

CalWEA is conceptually supportive of the Pathways Initiative, which will transfer governance authority over CAISO's planned Extended Day-Ahead Market (EDAM) to a new regional organization. We agree that EDAM will deliver substantial reliability and economic benefits by integrating and coordinating resource commitment across a broader swath of the western region. The Pathways Initiative is also an elegant solution to various concerns related to creating a West-wide RTO and we appreciate the enormous efforts that have gone into it.

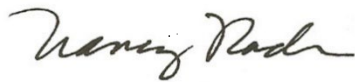
CalWEA does, however, wish to flag a concern regarding an unintended potential impact of EDAM on California's carefully crafted renewable energy and greenhouse gas reduction policies. The issue is that all EDAM resources will be co-mingled in a pool and may not be tracked with the electronic records (e-tags) that document the transfer of energy from a source to a sink. Under the State's Renewables Portfolio Standard (RPS) Program (PUC Sec. 399.11–399.33), to qualify as a Product Content Category 1 or 2 (PCC-1 or PCC-2) resource, such tracking is necessary to document delivery of energy from outside of California's Balancing Authority Areas (BAAs) into those areas. Such tracking is also needed under the State's zero-carbon laws (PUC Sec. 454.53) that require RPS-eligible renewable energy resources and zero-carbon resources to supply 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045.

While the EDAM stakeholder initiative has focused on, and presumably addressed, how individual state GHG policies and pricing will be preserved under EDAM dispatch, it

appears that no focus has been placed on preserving the tracking that supports compliance with California's RPS and zero-carbon electricity programs. CalWEA believes it may be necessary to adjust the RPS eligibility requirements to ensure that delivery of PCC-1 and PCC-2 resources into California's BAAs continues to be required and tracked. It is essential that California ensure that a suitable delivery and tracking mechanism is in place before California's load serving entities are authorized to participate in EDAM.

We therefore encourage the Energy Commission and other Pathway Initiative stakeholders to address this issue as soon as possible.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Rader".

Nancy Rader
Executive Director
California Wind Energy Association
Email: nrader@calwea.org