UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Western Seams Coordination	)	Docket No. AD26-10-000

COMMENTS OF THE AMERICAN CLEAN POWER ASSOCIATION, INTERWEST ENERGY ALLIANCE, AND RENEWABLE NORTHWEST ON THE SEPTEMBER 30, 2026 JOINT REPORT

The American Clean Power Association ("ACP"), [1] Interwest Energy Alliance ("Interwest"), [2] and Renewable Northwest, [3] (collectively, the "Clean Energy Organizations") respectfully submit these comments in response to the September 30, 2026, Joint Report of the California Independent System Operator Corporation ("CAISO") and Southwest Power Pool, Inc. ("SPP") in the above-captioned proceeding. [4]

I. INTRODUCTION

The Clean Energy Organizations and their members develop, own, and operate wind, solar, energy storage, and transmission facilities across the Western Interconnection. We appreciate the Federal Energy Regulatory Commission's ("Commission") attention to growing concerns about seams issues arising and worsening as more utilities join the CAISO's extended day-ahead market ("EDAM"), SPP's Markets+ day-ahead market goes live, and SPP's Regional Transmission Organization ("RTO") operations in the West evolve. We support CAISO's and SPP's ongoing

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1 The American Clean Power Association is a national multi-technology trade association representing companies in the wind, solar, energy storage, clean hydrogen, and transmission industries.

2 Interwest Energy Alliance is a regional clean energy industry association serving the Intermountain West.

3 Renewable Northwest is a regional nonprofit clean energy advocacy organization serving Washington, Oregon, Idaho, and Montana.

4 *Western Seams Coordination*, 196 FERC ¶ 61,032 (2026); Joint Report of California Independent System Operator Corporation and Southwest Power Pool, Inc., Docket No. AD26-10-000 (filed Sept. 30, 2026) ("Joint Report").

discussions to address these concerns. Their Joint Report identifies necessary work on information exchange, network modeling, loading relief, and the management of constraints affected by more than one market.

Organized wholesale electricity markets provide substantial benefits to consumers and the electric grid. By enabling more efficient regional dispatch and access to a broader and more diverse resource portfolio, these markets can lower costs, improve reliability, and make more effective use of existing transmission infrastructure. They can also create opportunities for improved transmission planning and more efficient approaches to resource adequacy. Preserving these benefits as markets develop should remain a central focus of the Commission's oversight of the Western Interconnection.

The Clean Energy Organizations believe that a single, integrated organized market across the Western Interconnection is preferable to minimize market seams and maximize regional efficiencies. Instead, the West is pursuing an incremental approach, with two energy imbalance markets and two day-ahead markets alongside CAISO's existing organized market and SPP's expanded Western RTO. The Clean Energy Associations respect the region's market choices and do not seek to revisit the Commission-approved market designs in this proceeding. However, given this evolving and fragmented market landscape, it is imperative that the Commission ensure that seams do not undermine the benefits of organized markets or result in unjust and unreasonable rates or undue discrimination. That requires timely, effective coordination and continued, active engagement by the market operators and affected stakeholders.

But the Joint Report cannot be the endpoint of this effort. As more utilities begin to participate in EDAM and Markets+ approaches its anticipated October 1, 2027 launch, SPP and CAISO must move from broad commitments to defined deliverables and reliable operating procedures. Critical aspects of the proposed coordination framework are targeted for the end of 2027 or later, but CAISO and SPP have not yet settled where key obligations will reside. Without

clear milestones, transparent accountability, and active stakeholder participation, significant operational and economic questions may remain unresolved when the markets begin operating alongside one another.

The Clean Energy Organizations urge the Commission to maintain firm pressure on timely implementation while continuing to support an open, collaborative process. We do not seek to reopen Commission-approved market designs or suggest that every long-term market-to-market settlement mechanism must be completed before go-live dates. We do ask, however, that the operational framework needed at launch be documented, tested, and available on a firm schedule, with clear accountability for measures that will follow.

II. IMPLEMENTATION MILESTONES MUST BE SPECIFIC AND ACCOUNTABLE

The Joint Report identifies six objectives focusing on improving market coordination, data sharing, transmission modeling, congestion management, and reliability across the Western market seams,[5] but several commitments lack milestones that permit the Commission and stakeholders to evaluate actual readiness. Data-sharing improvements are to be implemented progressively through 2027, expanded Western Interconnection Loading Relief ("WLR") and Enhanced Curtailment Calculator ("ECC") capability are targeted for completion by year-end 2027, and the framework for jointly impacted constraints is likewise targeted for adoption by the end of 2027. The Report expressly explains that adoption of the latter framework does not mean full implementation. Markets+ is expected to begin operating on October 1, 2027, but the Joint Report describes near-term objectives as ones they can "likely implement prior to or shortly after" that date.[6]

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5 Joint Report at 3-4.

6 Joint Report at 34-36, 40-41 & Attachment A.

This creates a timing concern, not merely a need for continued work. CAISO and SPP should make clear what will be operational on the first day of market operations, how transmission and interchange schedules will be coordinated, how jointly affected operating limits will be addressed, and what interim procedures will apply if an underlying WLR/ECC enhancement or market protocol has not been completed. Without those details, stakeholders cannot meaningfully evaluate readiness or the consequences of a missed milestone.

The Commission should require that CAISO and SPP publish, no later than January 31, 2027, a consolidated implementation schedule identifying each near-term deliverable, responsible entity, stakeholder-review period, testing date, necessary regulatory approval, and dependency. The parties should also provide quarterly public progress reports in this docket that identify completed work, changes in scope, missed milestones, corrective actions, and any interim operational protections. If a milestone changes, the parties should explain why and identify the revised implementation date rather than deferring the issue indefinitely.

By the October 2027 Markets+ launch, CAISO and SPP should have documented and tested the coordination procedures needed to recognize transmission rights and schedules, exchange material outage and transfer information, identify jointly impacted constraints, assign and communicate reliability relief, and escalate disputes or urgent operating concerns. These steps are not a demand for premature implementation of the complete long-term financial framework; they are basic safeguards for reliable market-to-market interaction from the start.

III. THE SEAMS AGREEMENT SHOULD BE SUBMITTED WITH SUFFICIENT LEAD TIME

The Clean Energy Organizations support CAISO's and SPP's intention to negotiate and submit a seams coordination agreement for an October 1, 2027, effective date. We are concerned, however, by the Joint Report's statement that the initial agreement "will primarily serve to memorialize the parties' commitment to the near-term objectives and workstreams" and that the

parties may submit this agreement later if circumstances warrant.[7] A statement of shared objectives provides a useful foundation, but by itself does not tell affected market participants what procedures will control when competing schedules or jointly impacted constraints must be managed.

The Commission should require CAISO and SPP to produce an initial agreement and supporting operating documents that identify relevant responsibilities, data-sharing obligations, coordination triggers, escalation and dispute-resolution steps, and the treatment of transmission service rights and schedules. It may be appropriate for these implementation details to remain in CAISO business practices, Markets+ Protocols, Reliability Coordinator or Transmission Operator procedures, or bilateral agreements.[8] But SPP and CAISO should publish a clear mapping of those documents so that stakeholders know which obligations apply, how the documents interact, and how to obtain timely operational resolution.

To preserve meaningful Commission and stakeholder review before go-live, the Clean Energy Organizations recommend that SPP and CAISO circulate a draft seams coordination agreement and related operating procedures for public comment by April 30, 2027, and target a Commission filing by June 30, 2027. The seams coordination agreement should distinguish provisions expected to be operational by October 1, 2027, from subsequent enhancements, and it should establish interim measures and specific deadlines for work that cannot be completed before launch. These target dates would provide a workable review period without changing the underlying market designs.

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7 Joint Report at 34.

8 *See id.* at 33-34, 42.

IV. CONTINUED AND ACTIVE STAKEHOLDER ENGAGEMENT IS ESSENTIAL

The Clean Energy Organizations appreciate the joint workshops, technical discussions, and stakeholder forums that CAISO and SPP have already undertaken. We strongly support their continuation throughout the design, testing, implementation, and post-launch evaluation of seams procedures. Seams issues do not involve only the two market operators. They also affect balancing authorities, transmission operators, transmission service providers, transmission customers, independent generators, storage operators, and entities that remain outside the day-ahead markets.

For this reason, the Commission should encourage CAISO and SPP to maintain a regular series of publicly noticed joint technical workshops, circulate draft procedures and implementation schedules sufficiently in advance for meaningful review, provide written responses to significant stakeholder concerns, and establish an accessible means to raise and track emerging seams issues. Independent resource and transmission interests must have a meaningful opportunity to inform the processes before key procedures are finalized, not simply receive updates after decisions have been made.

We also encourage regular communication between the market operators' stakeholder processes and the forums of the Western Reliability Coordinators (including the Western Reliability Executive Committee and the ECC Working Group that reports to it), balancing authorities, and transmission operators involved in implementing WLR/ECC and jointly impacted constraint coordination.[9] Continued engagement should be a core feature of the implementation plan, with transparency about which body is responsible for each decision and what avenues are available for stakeholder participation. The Clean Energy Organizations and our members stand ready to participate constructively in this work.

[9] *See id* at 37, 40.

V. LONGER-TERM ECONOMIC SEAMS ISSUES REQUIRE AN IDENTIFIED PATH FORWARD

The Joint Report recognizes that the Western Interconnection does not yet have coordinated least-cost redispatch across organized markets and that equitable allocation of redispatch costs associated with loop flows remains unresolved. We agree that a reliable common model, flow attribution, and operational procedures are prerequisites to a more sophisticated financial framework. But those prerequisites should not become grounds for leaving compensation, settlement, and the allocation of costs created by external flows without any implementation horizon.[10]

The Clean Energy Organizations therefore recommend that CAISO and SPP establish a date certain for publishing the longer-term market-to-market plan, with a target no later than June 30, 2028. That plan should identify the sequence for evaluating coordinated redispatch, cost attribution, compensation, settlement, and the treatment of bilateral and non-market systems. It should also identify potential tariff or coordination-agreement changes and provide opportunities for stakeholder input at each meaningful decision point. With SPP having begun development of Intermarket Optimization to automatically effectuate Real-Time transactions between SPP and Markets+ by making use of residual transmission in the Real-Time Balancing Market with an implementation in 2028, there is already actionable effort being made on this issue. SPP and CAISO should work towards extending this effort to integrate EDAM as well.

Work on these longer-term issues should begin in parallel with, not after, the operational workstreams. The Joint Report itself states that the objectives in Attachment A, including the longest-term plan, "will be worked on concurrently, not sequentially," yet it schedules that plan as a "subsequent phase following implementation of the near-term work."[11] Information and

[10] *Id.* at 28-32.

[11] *Id.* at 42 & Attachment A, n 27.

operating experience gathered during the initial months of Western market coordination will be especially valuable for testing assumptions and assessing whether the interim arrangements are producing avoidable congestion and costs.

VI. CONCLUSION

The Clean Energy Organizations appreciate CAISO's and SPP's continued work on Western seams coordination and support the objectives identified in their Joint Report. We urge the Commission to press for a public, date-certain schedule with quarterly progress reporting; documented and tested interim operating procedures before October 1, 2027; timely circulation and filing of a functional seams agreement; continued and active stakeholder engagement; and a defined schedule for addressing remaining economic seams questions.

Clear implementation deadlines and sustained collaboration are complementary, not competing, goals. Both will be necessary to work through Western market seams issues to enable organized wholesale markets to realize their full reliability and economic benefits. The Clean Energy Organizations look forward to continued engagement with CAISO, SPP, the Commission, and other Western stakeholders.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this pleading has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 30 day of October, 2026.

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