Stakeholder Comments Template

Market Seams Workshop

This template has been created for submission of stakeholder comments on the Market Seams Workshop that was held on Oct 22, 2026. The Stakeholder meeting presentation and other information related to this initiative may be found on the webpage at: https://www.caiso.com/meetings-events/topics/market-seams

Upon completion of this template, please submit it to ISOStakeholderAffairs@caiso.com.

Submissions are requested by close of business on **November 5, 2026**

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Please provide your organization's feedback on the Joint Market Seams Workshop that was held on October 22, 2026.

   IPC would like to thank SPP and CAISO for their continued work toward a coordinated seams solution and for the opportunity to provide comments. IPC also appreciates WECC for hosting the workshop and for its continued support of organized market development across the West.

   Conceptually, IPC believes WLR represents a significant improvement over UFMP and appears to provide a more comprehensive approach than the loading-relief processes traditionally used in the Eastern Interconnection. WLR takes a flow-based approach to identifying what is actually contributing to a transmission constraint, including tagged transactions, dynamic schedules, and Generation-to-Load (GTL) impacts. This provides the Reliability Coordinator with a more complete picture of the sources contributing to a constraint and the amount of relief each should provide. From a reliability perspective, IPC believes WLR is an improved tool to help the reliability management side of seams.

   The remaining question is how EDAM and Markets+ economically manage shared congestion before WLR is needed. Both markets can economically redispatch

generation to manage internal market transmission constraints, while WLR ultimately serves as a reliability backstop. IPC believes the economic coordination between the two markets should support the same physical objectives as WLR. This includes evaluating which market can relieve a shared constraint at the lowest overall cost, how that redispatch is coordinated between the markets, and how the resulting congestion costs and benefits are appropriately allocated between EDAM and Markets+ participants. Ideally, the seams framework should encourage the most economically efficient solution to a shared constraint before reliability-driven curtailments become necessary.

IPC also finds Paul Dockery's 9-node network examples extremely helpful in explaining these complex seams issues. IPC encourages CAISO and SPP to continue using these simplified examples in future workshops to illustrate how congestion, market optimization, and WLR would interact across the EDAM and Markets+ seam.

2. Please provide any suggestions for content or format for upcoming Join Market Seams Workshops.

1. When does market optimization stop and WLR begin?

IPC seeks a clearer framework defining when EDAM and Markets+ should economically redispatch resources and when the Reliability Coordinator should initiate WLR. Market optimization should manage congestion economically whenever possible, with WLR serving as the reliability backstop when additional relief is required.

2. Recognize the economic value of counterflow

Some transactions increase congestion, while others provide counterflow that helps relieve it. IPC encourages CAISO and SPP to recognize and appropriately compensate resources and transactions that mitigate shared constraints.

3. Avoid solving the same constraint twice

If EDAM or Markets+ has already redispatched resources to relieve a constraint, that action should be recognized by the other market and by WLR. IPC wants to avoid paying for economic redispatch and then requiring additional reliability relief for the same constraint. WLR already accounts for potential double counting between GTL and tagged transactions, and IPC encourages CAISO and SPP to apply the same principle to coordination between EDAM and Markets+