

Portland General Electric's Perspective on the Gas Resource Management Final Proposal

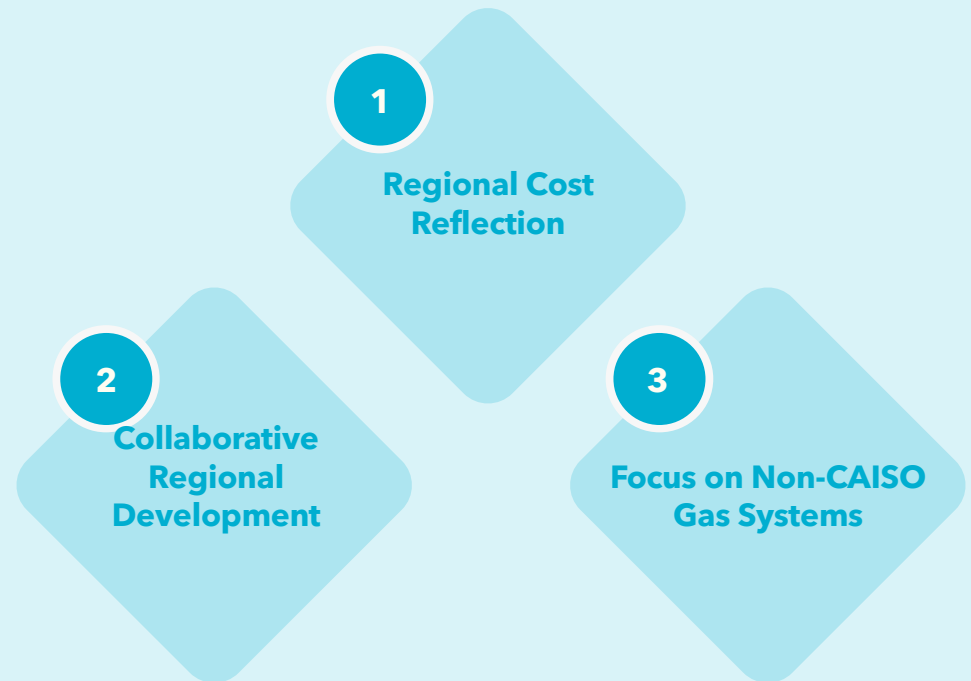
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PGE's Position and Focus Areas

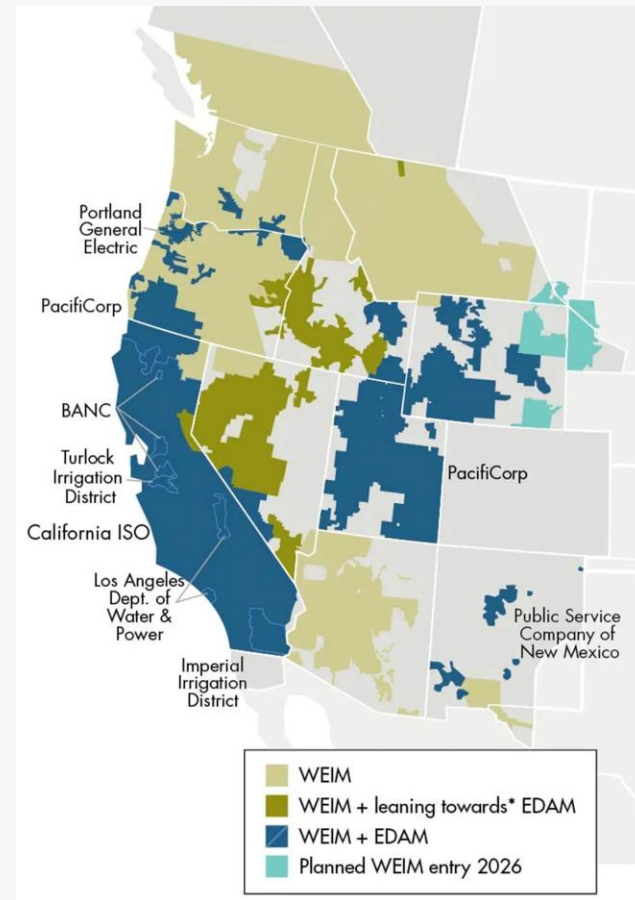
- The Final Proposal is a **clear improvement** over the status quo and strengthens readiness for EDAM participation.
- PGE appreciates the **collaborative process** and the ISO's responsiveness to regional input.
- PGE's priorities have centered on ensuring GRM tools support participation for **non-CAISO gas systems**, where conditions differ materially.



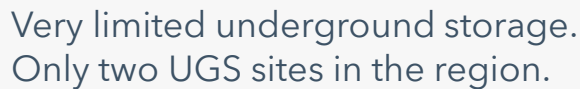
Core Challenge for PNW EDAM Participants

Distinct gas systems mean different operational risks.

- **PNW gas conditions differ materially** from CAISO's system: lower liquidity, limited storage, and long-haul delivery paths.
- **EDAM's timelines intersect with Timely gas nominations**, making next-day procurement more uncertain for gas-fired resources.
- **Reliable participation requires predictable, regionally calibrated cost-reflection tools.**



EDAM BAA market participation or leaning (December 2025)



Key PNW trading hubs (circled)

Default GPI Adjustment: Implications for PNW EDAM Entities

Purpose

- Allows resources to seek **higher GPIs** when local volatility exceeds Citygate norms.
- First tool that **recognizes chronic PNW hub volatility**, not just rare events.

Value

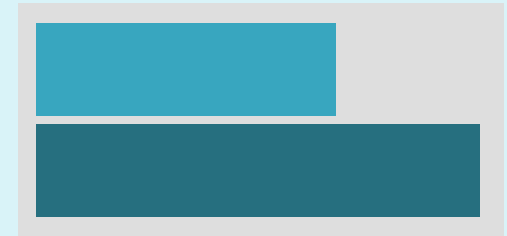
- Reduces repeated RLCR filings as the “normal” cost-reflection method.
- Creates a predictable, documented path for units with structurally higher fuel costs.

Implementation Considerations

- Whether **benchmark tests** capture volatility at Sumas/Stamfield/Malin.
- Administrative burden on smaller EIM/EDAM entities.
- Consistency of adjustments granted **outside the CAISO BAA**.

Default GPI

Adjusted GPI



Illustrative: adjusted GPI reflects structurally higher volatility in PNW hubs.

D+2 Advisory: Supporting Timely Gas Procurement

Key Benefits

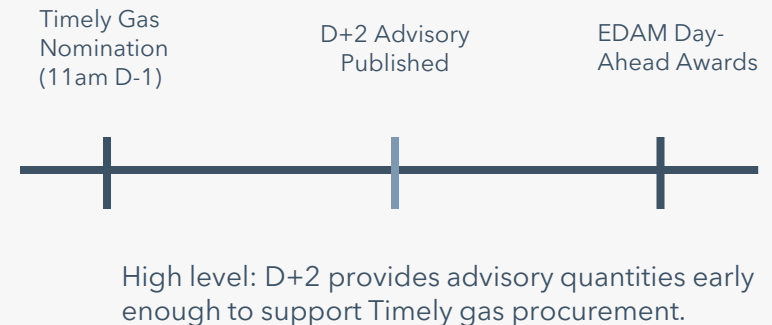
- Provides **early next-day schedules** ahead of the Timely gas nomination cycle.
- Offers the first actionable signal for gas-fired resources without storage.

EDAM Readiness Value

- Reduces risk of both **under-procurement** (short gas) and **over-procurement** (stranded fuel).
- Better aligns market commitments with **PNW physical gas realities**.

Implementation Considerations

- **Accuracy** of D+2 versus final DA outcomes once EDAM goes live.
- Stability of D+2 during **high-stress winter conditions**.



Implementation Considerations for a Diverse EDAM Footprint

- **Monitor GPI Adjustment outcomes across regions** to ensure the benchmark and evidence tests work **consistently** for entities outside the CAISO BAA.
- **Track D+2 accuracy** as a performance metric once EDAM is live, **especially during winter periods** when PNW gas systems are stressed.
- Ensure **administrative requirements remain workable** for smaller EIM/EDAM entities as they update supporting materials every four months.
- **Maintain design flexibility** so **GRM tools can scale** as additional BAAs with different gas system conditions join EDAM.

Closing Perspective

- PGE appreciates the **collaborative and transparent** stakeholder process that shaped the Final Proposal.
- We see the package as a **meaningful improvement** over the status quo, especially for EDAM entities operating in diverse gas systems.
- The GPI Adjustment and D+2 Advisory are the **most impactful tools** for supporting reliable PNW participation.
- We look forward to working with the CAISO and WEIM/EDAM community as these tools are **implemented, measured, and refined** over time.

PGE is committed to supporting a reliable, scalable EDAM, and we view these GRM elements as important steps toward that goal.

**Let's
meet the
future
together.**