

Western Energy Imbalance Market Assistance Energy Transfer Proposal

Stakeholder comment summary

July 2025

Stakeholder Name	Stakeholder Comment Summary	ISO Response
Avangrid	Supports both aspects of the proposal. Advocates that the ISO commit to broader AET reform, potentially developing a surcharge that is based on prevailing market prices in 2026 following the launch of EDAM.	These enhancements will be considered and prioritized in the ongoing open and transparent policy catalog and roadmap stakeholder process.
CalCCA	Supports both aspects of the proposal. Agrees that the creation of the exemption for reliability driven actions is consistent with AET's promotion of reliability.	CALCCA's support is appreciated.
CAISO – Department of Market Monitoring	The DMM agrees with ISO that developing an "in-market" approach is a significant and complicated undertaking that is not clearly needed per the ISO's analysis.	The DMM's support is appreciated.
Idaho Power Co.	Supports both aspects of the proposal. Idaho Power advocates for the continued development of the AET product.	Idaho Power's support is appreciated. These enhancements will be considered and prioritized in the ongoing open and transparent policy catalog and roadmap stakeholder process.
Nevada Energy	Supports both aspects of the proposal.	NVE's support is appreciated.
Pacific Gas & Electric	Supports both aspects of the proposal. PG&E advocates for the continued development of the AET product.	PG&E's support is appreciated. These enhancements will be considered and prioritized in the ongoing open and transparent policy catalog and roadmap stakeholder process.

PacifiCorp	Supports both aspects of the proposal. PacifiCorp advocates for a CMRI report that provides information on BA specific volumes of economic displacement transfers that are exposed to the AET surcharge.	PacifiCorp's support is appreciated. The request for the CMRI report is outside the scope of this initiative as a tariff change is not required. This request can be submitted via the <i>Customer Inquiry, Dispute and Information</i> process and will be prioritized by the customer service team.
Portland General Electric	Supports both aspects of the proposal. PGE advocates for improving the functionality and timing associated with opting in and out of AET.	PGE's support is appreciated. The request regarding the functionality and timing of opting in and out of AET is outside the scope of this initiative as a tariff change is not required and will be considered if technically feasible.
Southern California Edison	<p>Supports the proposal and reiterates the importance of continual monitoring and reporting of the existing AET design. States that rather than eliminating the sunset date associated with existing AET product, SCE prefers that the ISO extend the sunset date as a forcing mechanism to revisit the design.</p> <p>Supports the creation of the exemption for reliability driven actions but requests examples and clear guidelines on how these will apply.</p>	SCE's support is appreciated. Rather than creating another sunset date, these enhancements will be considered and prioritized in the ongoing open and transparent policy catalog and roadmap stakeholder process. The business practice manuals will reflect further clarification on the creation of the exemptions.