

September 4, 2026

Subject: State Water Contractors Comments on the Regional Organization for Western Energy Draft Briefing Book

Founded in 1982, the State Water Contractors (SWC) is an association of 27 public water agencies serving more than 27 million Californians and 750,000 acres of farmland across the state. SWC member agencies hold contracts with the California Department of Water Resources (CDWR) for delivery of water throughout the state of California and are responsible for 100% of the capital, operation and maintenance costs of the State Water Project (SWP).

The SWP is a water conveyance system that includes 29 water storage facilities, approximately 700 miles of aqueducts and pipelines, 21 pumping plants, three pumping-generating plants, and five hydroelectric power plants. The SWP generates between 1,500 and 5,000 gigawatt-hours and consumes between 2,500 and 9,500 gigawatt-hours of energy per year, making it one of the single largest producers and consumers of energy currently in the California Independent System Operator (CAISO) balancing authority area. The SWP's obligations consist of water delivery, flood control, recreation, environmental flows, and interstate water-user transfers, meaning its power generation and consumption vary year to year with hydrology.

SWC anticipates that CDWR will be an active participant as both a generator and consumer of large amounts of electricity. As customers of the SWP, SWC represents a similar, but separate voice from CDWR as it relates to energy market operations and the two should not be treated as a singular interest.

As a trade association representing public water agencies that hold contracts with CDWR-SWP and pay for all costs, including the purchase of energy, SWC does not fit neatly into the Guidebook's listed sectors and could reasonably fall into several, such as Consumer Advocates, Large C&I, or Public Interest Organizations. SWC urges the future ROWE Board to build sector fluidity into the stakeholder structure at formation, and to revisit sector definitions and participation rules within its first few years to allow participants the opportunity to find the appropriate sector.

SWC recommends the ROWE budget for account, client, or stakeholder relations personnel from the outset to help stakeholders navigate what will be a developing process. CAISO's Client Relations staff help stakeholders track initiatives, timelines, and engagement with other CAISO staff and the Board of Governors and have proven invaluable to SWC in navigating complex topics and schedules; SWC encourages the ROWE to build comparable capacity early.

SWC appreciates the opportunity to provide additional context to the draft ROWE Briefing Book and looks forward to continued work in preparation for the establishment of the ROWE Board and organization.

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