



December 16, 2025

Re: CAISO 2026-2028 Policy Initiatives Roadmap

To the ISO Board of Governors and WEM Governing Body,

The California Solar and Storage Association (CALSSA) submits these comments to support the CAISO's 2026-2028 policy initiatives roadmap process. Specifically, CALSSA strongly supports inclusion of the Demand and Distributed Energy Market Integration (DDEMI) initiative into the CAISO's 2026-2028 policy initiative roadmap. CALSSA has been very involved in the DDEMI initiative and has greatly appreciated CAISO staff's efforts to date to make this a productive initiative. Several issues currently being considered in the DDEMI initiative, including crediting exports from behind-the-meter resources participating through the Proxy Demand Resource (PDR) participation model and revising PDR direct metering rules, need to be addressed to enable these resources to successfully participate in the CAISO market, and therefore including the DDEMI initiative in the roadmap for 2026-2028 is important to CALSSA's member companies. CALSSA is among many stakeholders that support the DDEMI initiative, and we urge the CAISO to prioritize the issues mentioned above for policy development in early 2026. CALSSA appreciates the ISO Board of Governors and WEM Governing Body's consideration of this topic and looks forward to continued collaboration with the CAISO.

Sincerely,

/s/ Jon Hart  
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California Solar & Storage Association