

December 5, 2025
Lindsey Schlekeway
NV Energy
Chair, Regional Issues Forum

Dear Chair Schlekeway:

Southern California Edison ("SCE") respectfully submits these comments for consideration as the Regional Issues Forum ("RIF") works to enhance its involvement in the California Independent System Operator Corporation ("CAISO") stakeholder processes and to begin the transition to the proposed Stakeholder Representatives Committee ("SRC") of the expected Regional Organization ("RO"). Generally, SCE supports the proposed enhancements though it recommends, as explained below, that the enhancements be pursued at a walking pace to ensure that allow for the RO to further define the SRC's role and that there is appropriate learning from pilot efforts around indicative voting and Initiative sponsorship. Further, 2026 represents a great step-forward for CAISO markets with the expansion the CAISO's day-ahead electricity market that may require substantial resources from CAISO staff and stakeholders to address emergent policy issues associated with that expansion. This expansion offers both opportunities and risks for the proposed enhancements. First, there will be opportunities for Initiative sponsors to support the CAISO expansion of day-ahead markets, facilitating communication, organizing feedback, and ensuring all viewpoints are heard and considered. However, there will be risks should there be a need to expediently address emergent policy issues as a part of CAISO's day-ahead market expansion and the enhancements pose bureaucratic barriers to the necessary expediency of effort. Thus, while SCE supports the enhancements, SCE recommends that the RIF and RIF leadership pay close attention to perceived efficacy of voting and Initiative sponsorship.

SCE wishes to note a point of concern about the proposed enhancements that the RIF should consider as it moves forward with the enhancements. First, while there has been broad support for indicative voting in the CAISO stakeholder process, it must be recognized that the RIF's role in this enhancement is simply to recommend to the CAISO that it introduce indicative voting and not to implement a function separate from the CAISO stakeholder process. Additionally, SCE insists that the indicative voting process that the RIF recommends to the CAISO be fully characterized as indicative only without potential for evolving into a process that becomes binding. The Initiatives often tackle policy issues that are highly technical and subject to the context of tariff interpretation and SCE does not support replacing CAISO staff and leadership expertise with a voting process.

The proposal to introduce sector sponsorships for CAISO working group Initiatives represents a good opportunity to organize and facilitate communication between CAISO Initiative staff and stakeholders. SCE believes that piloting this enhancement will be helpful to better define the role sector sponsors can play and test the level of resource commitment from the sponsors necessary to ensure the role provides incremental value to the stakeholder process. SCE recommends utilizing sector sponsors for at least two new Initiatives in 2026, perhaps one being an emergent Initiative following the implementation of EDAM where clear and direct communication between the CAISO and stakeholders will be crucial to the success of the Initiative.

Again, SCE thanks the RIF for committing to improving the CAISO stakeholder process for today and for the future RO.

Sincerely,

Jonathan Rumble

Southern California Edison