**San Diego Gas and Electric's Comments on the
Regional Issues Forum Enhancement Project
Draft Final Proposal**

Near-Term Enhancements

<u>Policy Initiatives Catalog and Roadmap</u>

1. Are there any additional considerations that you would propose to enhance the Catalog and Roadmap process other than those proposed in this draft final proposal?

> The Draft Final Proposal contemplates an expansion of the RIF's current role in the CAISO policy initiative roadmap to mirror the SRC function. Aspects of the proposal align with current RIF practices (i.e., the roundtable) while other aspects contemplate new outputs and work products that could be used in an advisory capacity by CAISO staff. This includes indicative voting, which at this point will not carry any formal authority, but may provide valuable experience for stakeholders, CAISO, and the eventual SRC.

> SDG&E's comment on the roadmap focuses on how the RIF and CAISO will communicate their decisions when developing procedures for handling 'support with caveats' positions both for the roadmap process and in the indicative voting process more generally. The indicative voting will be an opportunity to distill complex feedback from stakeholders on initiatives, but it is rare that stakeholders are fully in support or opposed to an initiative or proposal. SDG&E would be interested in understanding the decision-making for these guidelines and if any lessons learned based on experience with indicative voting will be conveyed to the broader stakeholder community.

2. Do you support the proposed enhancements to the RIF's involvement in the catalog and roadmap process?

> SDG&E supports the enhancements outlined in the draft final proposal, noting that this stepwise approach is designed to ease the transition to the SRC and will be a learning process, requiring flexibility and responsiveness to the outcomes of the first step.

<u>Sector Sponsor Pilot Program</u>

1. Are there other guidelines the RIF should consider for defining the sponsor role?

> SDG&E is supportive of how the RIF proposes to pilot the sponsorship role but believes that the RIF and other stakeholders should continue to work together to develop more details about sponsorship going forward. The guidelines outlined in the draft final proposal provide a solid starting point but remain fairly high-level for the sponsorship

role in general. As the RIF has stated, the initial proposal's intent is to define the role's purpose rather than its implementation details. However, after the pilot, the specifics of how sponsors operate in practice—such as how sponsors will engage stakeholders, report on their efforts, and sustain initiative momentum—are critical details that will inform whether the sponsorship role is able to deliver on its purpose.

Many questions about these processes remain unresolved, and SDG&E believes they must be addressed transparently to ensure consensus on the sponsor's role and practicality regarding workload and achievable outcomes. Additionally, it is SDG&E's perspective that the RIF should consider defining longer-term considerations for electing sponsors and evaluating the effectiveness of the role. In particular, SDG&E would like to see clearer guidelines around transparency and potential guardrails, how to facilitate a deeper bench of individuals who can serve in the sponsorship role, and how lessons learned and feedback will be integrated.

2. Is there a particular initiative from the 2025 Policy Initiatives Catalog that you believe the RIF should consider for piloting the sponsor role?

The initiative that is used for the sponsor pilot program should have participation from a broad spectrum of stakeholders. SDG&E supports choosing an initiative where sector sponsors can bridge various stakeholder groups to find alignment, facilitate discourse, encourage compromise and develop novel solutions. To that end, choosing an initiative that touches EDAM or WEIM participants would likely reflect the end product for sponsorship as contemplated by the proposal. However, debuting this sponsorship role on issues at the forefront of EDAM, such as EDAM Congestion Revenue Allocation or any upcoming year-one EDAM enhancements, during this critical period before and during go-live, may not be the type of initiative to conduct a pilot with. SDG&E also notes that it would be ideal to test the sponsorship program with a new initiative, rather than one that is well underway. However, given the somewhat limited list of initiatives available to choose from as established in the draft policy roadmap, debuting the pilot program with an existing initiative that will be entering a new phase in 2026 may thread the needle for this aspect.

<u>Indicative Voting</u>

1. Which report types would be the most helpful when reporting the indicative voting results?

The best path would be to give indicative routing results in full and allow entities to tabulate that data by group as needed.

2. Which report types would be the most helpful when reporting indicative voting results? Provide any additional indicative voting reports that should be considered.

No comment.

<u>Function and Purpose of RIF</u>

1. Stakeholder perspectives on RIF's role and process for providing comments on behalf of the RIF.

    SDG&E supports the proposal to develop a more formalized process for developing comments on active stakeholder topics, including guidance on which topics to provide input on. A clarifying question however, is how sectors will provide feedback to the RIF and their sector representatives on any drafted comments.

Facilitate Transition of RIF into SRC

1. Are there any additional actions that would be important for the RIF and Pathways to consider in order to effectuate this transition?

    No comment.