California ISO

Stakeholder Comments Template

AB 825: California Jobs Study

This template has been created for submission of stakeholder comments on the AB 825: California Jobs Study workshop that was held on November 10, 2026. The Stakeholder meeting presentation and other information related to this workshop can be found on the meeting webpage at: https://www.caiso.com/meetings-events/topics/ab-825

Upon completion of this template, please submit it to ISOStakeholderAffairs@caiso.com.

Submissions are requested by close of business on **November 24, 2026.**

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. **Please provide your organization's overall feedback regarding the AB 825: California Jobs Study Stakeholder Workshop held on November 10, 2026.**

Environmental Defense Fund (EDF) thanks the California Independent System Operator (CAISO) for the opportunity to comment on the AB 825 Jobs Study Report. EDF also thanks the Berkeley Economic Advising and Research (BEAR) team for its work on this jobs study. EDF particularly appreciates BEAR's willingness to engage with stakeholders throughout the development of the study and its responsiveness to the questions provided by EDF during the preceding workshops.

Overall, EDF is satisfied with the workshop process. EDF believes that CAISO has satisfied its obligations under California Public Utilities Code §345.6(f)(2) on its obligations for holding workshops on both the methodology and the results of the jobs study.

2. Please provide your organization's feedback regarding the AB 825 Jobs Assessment presentation given by Berkeley Economic Advising and Research (BEAR).

EDF is a strong proponent of the Extended Day-Ahead Market (EDAM) and expanded usage of regional electricity markets in the West, including through its participation on the West-Wide Governance Pathways Initiative (Pathways) Launch Committee and as the co-sponsor of AB 825.

California Public Utilities Code §345.6(f)(1) directs CAISO to conduct a study of the impacts of electrical utilities participating in voluntary energy markets governed by an independent regional organization on the creation or retention of jobs in California. The study shall specifically include the impact on jobs constructing and maintaining powerplants in California. California Public Utilities Code §345.6(f)(3) requires that the study be concluded by December 31, 2026 and be transmitted to the legislature. EDF believes that the study, with the clarification described below, is ready for the Board to review and transmit to the legislature.

In reaching this conclusion, EDF recognizes the importance of understanding how the transition to a regional electricity market will affect California's skilled workforce, alongside the reliability, affordability, and decarbonization benefits that a larger regional market can deliver back to ratepayers. EDF agrees with the overall findings of the draft report, which estimates that the implementation of AB 825 and participation in a voluntary regional electricity market in the West would have a net positive impact on jobs constructing and maintaining powerplants in California: the report estimates that AB 825 adds about 1,735 permanent operations and maintenance (O&M) jobs in 2040 and about 75,200 construction job-years over 2025-2040, while SB 100 accounts for a further 6,100 O&M jobs and 384,900 construction job-years.[1]

However, EDF seeks one clarification to the report before it is finalized, concerning the treatment of California's Renewables Portfolio Standard (RPS) after 2030. The report's Baseline assumes that, absent AB 825, the RPS requirements and the portfolio content

[1] BEAR, AB 825 Economic Impact Study: Jobs Assessment Report (Nov, 10, 2026), Table 1, p. 7 (four-way Shapeley attribution).

categories do not continue after 2030, and the report credits AB 825 with keeping them in force through 2040.[2] EDF believes that assumption is inconsistent with existing law. SB 100 (2018) amended Public Utilities Code §399.15(b)(2)(B) to require 60% renewable procurement by 2030 and to direct the California Public Utilities Commission to establish compliance periods "for all subsequent years that require retail sellers to procure not less than 60 percent of retail sales" from eligible renewable sources. AB 825 states that §345.6(h)(1)(A) "does not change any requirement related to the California Renewables Portfolio Standard Program".

EDF is concerned that without this clarification, CAISO could mischaracterize AB 825's impact on California's RPS and notes that California's RPS requirements will continue beyond 2030, irrespective of the implementation of AB 825. EDF therefore does not view the employment benefits associated with the continuation of the RPS beyond 2030 as benefits that should be attributed to AB 825, although a regional electricity market will certainly make fulfillment of these goals occur at a lower total cost and with a higher degree of certainty of grid reliability.

Because of this, EDF believes that the headline employment estimate for AB 825 should not include the RPS extension. The RPS extension in the report accounts for about 772 of the 1,736 O&M jobs credited to AB 825 in 2040, and about 49,800 of its 75,200 construction job-years from 2025-2040.[3] EDF recommends that the executive summary present AB 825's contribution excluding the RPS extension as the headline figure, and state that the Baseline and SB 100 results remain affected by the post-2030 assumption.

EDF recognizes the complexities of conducting a forward-looking economic assessment within an evolving legislative and regulatory landscape. EDF views the BEAR study as a snapshot in time, informed by the statutory and regulatory framework as it exists today. The continuation of the RPS after 2030, however, does not depend on any future legislative or regulatory action.

[2] Report, p. 12.
[3] Report, Table 1, p. 5.

With that in mind, EDF appreciates BEAR's efforts to separately quantify the employment impacts associated with participation in a regional electricity market, the preservation of existing procurement requirements, and the continuation of the RPS beyond 2030. Presenting these results separately provides stakeholders with greater visibility into the individual drivers of employment growth and allows readers to understand the extent to which the estimated employment benefits attributed to AB 825 depend on interpretations of existing legislation. EDF observes that the study shows AB 825 would benefit California's power sector even without counting the effects of extending RPS requirements past 2030. Excluding the RPS extension, the report's figures imply that AB 825 adds about 964 O&M jobs in 2040, and about 25,400 construction job-years from 2025-2040.[4] EDF requests that the final report present this distinction clearly, by reporting AB 825's contribution both with and without the RPS extension and by stating that the continuation of the RPS after 2030 reflects existing law rather than AB 825.

EDF recognizes that determining the appropriate interpretation of these statutory provisions extends beyond the scope of an economic modeling exercise and EDF supports BEAR's recommendation that CAISO counsel confirm the interpretation before the report is finalized. EDF reiterates, however, that whichever factors are isolated, the study's results show that a regional electricity market benefits the State's power sector. The study assumes participation in a regional market doubles California's export capability by 2032,[5] and finds that the market would lower system costs by about $2.10/MWh in 2040.[6] Because the study limits export capability, additional transmission capacity could increase these benefits further.

EDF appreciates the continued efforts of CAISO and BEAR on this important study and looks forward to reviewing the final report.

3. Please provide any additional feedback not already captured.

[4] Calculated from Report, Table 1, p. 5.
[5] Report, p. 12.
[6] Report, p. 5.

EDF concludes from the study's findings that the expansion of the regional electricity market will add new high value jobs to the California economy. When considering the state's renewable resource potential combined with its supportive policy and slate of legislative requirements, EDF believes that this study reaches a natural conclusion that the regional electricity market is good for the workforce and for the ratepayer. EDF concludes that the CAISO has satisfied its statutory requirements and thanks them for an inclusive process.