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 September 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 **September 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 September 10, 2026.

Environmental Defense Fund (EDF) thanks CAISO for the opportunity to comment on the AB 825: California Jobs Study Stakeholder Workshop held on September 10, 2026. EDF commends CAISO for its continued commitment to fulfilling AB 825's requirements[1] by studying the employment impacts of transitioning governance of a regional energy market from CAISO to the Regional Organization for Western Energy (ROWE). EDF also thanks the Berkeley Economic Advising and Research (BEAR) team for its work on the study and thoughtful presentation of the results.

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

EDF supports the central finding of the results presented at the September 10 workshop: that California will see greater in-state employment under AB 825 than under the

[1] "California AB825 | 2025-2026 | Regular Session," LegiScan, https://legiscan.com/CA/text/AB825/2025

baseline. EDF has been among the most vocal proponents of the development and evolution of a day-ahead regional electricity market in the West, including through our support for AB 825. The results presented by BEAR align with EDF's expectation that a larger regional market will allow California to dispatch its abundant clean energy resources more efficiently by expanding access to those resources. EDF welcomes the quantitative evidence from this study that confirms that these benefits will translate into additional high-paying jobs in California's power sector.

While EDF supports the central findings presented, EDF offers feedback on how several assumptions are presented throughout the workshop to ensure clarity in the final report. Specifically, EDF recommends BEAR clearly and consistently distinguish between assumptions that are common to the baseline and AB 825 scenarios and incremental changes attributable to AB 825 in the final report.

First, EDF encourages BEAR to make clear how load growth is characterized. Slide 4[2] describes the projected 40 percent load growth by 2040 as a "background structural trend." However, Slide 5 identifies "Load Growth" under the heading "How AB 825 Improves Returns to Both Investors and Customers," Slide 12 identifies load growth as one of three "AB 825 Impact Channels," and Slide 14 includes load growth among the "delta adjustments" applied to the baseline scenario. These descriptions could suggest that the projected load growth is an incremental effect of AB 825. EDF encourages BEAR to consistently characterize load growth as a background assumption that applies to both the baseline and AB 825 scenarios, and clearly identify what changes, if any, are assumed between the two scenarios.

Second, EDF requests that BEAR provide additional clarity regarding the treatment of California's Renewables Portfolio Standard (RPS) and Portfolio Content Category 1 (PCC1) requirements in the final report. The presentation states that AB 825 "freezes" PCC1 eligibility as of December 31, 2025, and identifies RPS/PCC1 balancing as an AB 825 impact channel. AB 825 added Public Utilities Code Section 399.16.5, which provides that the transition to a regional energy market shall not expand the types of transactions that qualify for PCC1 compared with those that qualified on December 31, 2025.[3] In other words, the legislation preserves the PCC1 eligibility framework that existed prior to regionalization. AB 825 also provides in Section 345.6(h)(1)(A) that the regional market authorization "does not change any requirement related to the California Renewables Portfolio Standard Program."[4] Given these provisions, EDF suggests that BEAR confirm how the RPS/PCC1 assumptions are treated in the baseline and AB 825 scenarios and what incremental change attributable to AB 825 drives the difference between the two scenarios.

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[2] https://www.caiso.com/documents/presentation-berkeley-economic-advising-and-research-ab-825-jobs-study-preliminary-results-sep-10-2026.pdf

[3] "California AB825 | 2025-2026 | Regular Session," LegiScan, https://legiscan.com/CA/text/AB825/2025

[4] "California AB825 | 2025-2026 | Regular Session," LegiScan, https://legiscan.com/CA/text/AB825/2025

EDF recognizes that the scenarios presented by BEAR are a snapshot based on assumptions regarding future electricity demand, generation development, and other factors that will continue to evolve. The precise number of jobs estimated by the model will therefore depend on these assumptions. EDF does not believe that uncertainty regarding the precise trajectory of future load growth should distract from the central finding of this study: that employment in California’s energy sector will benefit from the regional market authorized by AB 825. However, EDF recommends that BEAR clearly present the assumptions applied to both scenarios in the final report, while emphasizing that changes in the underlying assumptions affect the magnitude of the estimated employment benefits rather than the overall directional finding.

3. Please provide any additional feedback not already captured.

EDF submitted comments following the June 9, 2026, workshop that suggested analyzing how employment impacts may differ depending on the eventual Extended Day-Ahead Market (EDAM) footprint.

Because the future EDAM footprint is unclear, EDF reiterates its recommendation that BEAR explore how employment impacts may vary depending on its size. The size of the regional market will affect how many buyers can access California’s resources and, consequently, the potential for increased exports and reduced renewable curtailment. EDF encourages BEAR to consider whether sensitivity to the eventual EDAM footprint can be incorporated into the assumptions regarding curtailment reduction and capacity factor improvements in the AB 825 scenario.

EDF thanks CAISO and BEAR for their continued work on this important study and looks forward to reviewing the final report.