



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 June 9, 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 **June 23, 2026**.

Submitted by	Organization	Date Submitted
<i>Dominic Peters</i>	<i>Environmental Defense Fund</i>	<i>6/23/2026</i>

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 June 9, 2026.

Environmental Defense Fund (EDF) thanks CAISO for the opportunity to comment on the AB 825: California Jobs Study Stakeholder Workshop held on June 9, 2026. EDF commends CAISO for its commitment to fulfilling AB 825's requirements¹ by studying the employment impacts of transitioning governance of regional energy markets from CAISO to the Regional Organization for Western Energy (ROWE).

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

EDF offers feedback on two methodological points regarding the AB 825 Jobs Assessment presentation given by Berkeley Economic Advising and Research (BEAR):

First, EDF is concerned that the current modeling approach may not capture the full range of scenarios surrounding Diablo Canyon's future operations. In April 2026, the federal Nuclear Regulatory Commission (NRC) renewed the plant's federal operating

¹ "California AB825 | 2025-2026 | Regular Session," LegiScan, <https://legiscan.com/CA/text/AB825/id/3131843>.

license through 2044 and 2045.² Under current state law, however, SB 846 authorizes Diablo Canyon to operate only thorough 2030, and any continue operation beyond that date would require legislation to lift or extend the SB 846 cap.³

EDF does not wish to take a position on whether Diablo Canyon should or should not continue operating. For the purposes of the jobs study, however, the possibility that the plant ceases operation by 2030 is relevant and should be modeled explicitly. Diablo Canyon's potential retirement in 2030 would require replacing the substantial baseload generation the plant provides, which may increase California's reliance on out-of-state imports and shifting associated jobs outside the state. Given the remaining uncertainty, EDF recommends that BEAR incorporate a scenario in which the plant continues its operation, and a scenario in which the plant is retired by 2030, within the Monte Carlo risk framework.

Second, EDF encourages BEAR to model how job impacts may vary with the eventual footprint of the Extended Day Ahead Market (EDAM). Because the size of the market will affect where generation, and related employment are located, and because EDAM's ultimate footprint is currently uncertain, EDF recommends modeling at least two scenarios: a base market footprint and an expanded market footprint. EDF suggests that BEAR use the Brattle study⁴ as the basis for the footprint scenarios.

EDF thanks BEAR for its thoughtful presentation and looks forward to the future workshop presenting preliminary results.

3. Please provide any additional feedback not already captured.

² "NRC Approves Diablo Canyon License Renewal, Extension," <https://www.ans.org/news/2026-04-03/article-7906/nrc-approves-diablo-canyon-license-renewal-extension/>.

³ "California SB846 | 2021-2022 | Regular Session," LegiScan, <https://legiscan.com/CA/text/SB846/id/2605677>.

⁴ *Extended Day-Ahead Market Benefit Study* | Brattle, Publications, September 11, 2023, <https://www.brattle.com/insights-events/publications/extended-day-ahead-market-benefit-study/>.