

May 4, 2026

**VIA ELECTRONIC SUBMISSION**

Office of the Clerk  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms**

Dear Chair Sanchez and Members of the California Air Resources Board,

The California Independent System Operator Corporation (CAISO) submits these comments on the modifications to the proposed amendments to the California Air Resources Board's (CARB) regulations related to the California Cap on Greenhouse Gas Emissions and Market Based Compliance Mechanisms (15-Day Changes). The CAISO supports updates made in the 15-Day Changes and confirms its commitment to coordinate with CARB and CAISO market participants to provide data necessary to support applicable reporting requirements.

The updates that CARB has proposed in the 15-Day Changes respond in part to CAISO's comments submitted Mar 9, 2026. The CAISO supports the updated outstanding emissions calculation in proposed regulations Section 95111(h)(1). The proposed updates are consistent with data the CAISO provides in support of existing reporting practices, and will ensure continuity with the successful launch of the Extended Day Ahead Market (EDAM) that occurred on May 1, 2026.

The outstanding emissions calculation for CAISO Market Purchaser's Retail Sales, proposed regulation Section 95111(h)(2), accounts for emissions from settled, real-time market results. Entities participating in the Extended Day Ahead Market (EDAM) will report their real-time market transfers to serve California load, consistent with existing and continuing data reporting practices for the Western Energy Imbalance Market (WEIM). By maintaining this practice, the CAISO expects minimal disruption to reporting entities' processes after the EDAM launch.

The updated methodology recognizes the role of the Greenhouse Gas (GHG) counterfactual, a tool the CAISO currently uses in the WEIM to improve GHG accounting accuracy and transparency. CARB's proposed outstanding emissions calculation for WEIM-only participants reflects the CAISO's on-going practice of using each WEIM resource's base schedule as its GHG counterfactual. CARB proposes a separate calculation for EDAM entities that uses a resource's day-ahead GHG

counterfactual schedule in lieu of a base schedule. This update is necessary for continuity because, now that EDAM is live, day-ahead participating entities no longer submit base schedules.

Where the regulations call for new data arising from the implementation of EDAM, the CAISO commits to provide this data subject to applicable nondisclosure requirements to support CARB's program. The CAISO also commits to work with its market participants to address any questions regarding what CAISO market data informs any reporting obligation they may have under CARB's program.

Thank you for consideration of these comments.

Respectfully submitted,

**/s/ Sarah Kozal**

Sarah Kozal  
Senior Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 956.8838  
[skozal@caiso.com](mailto:skozal@caiso.com)

**/s/ Sylvie Spewak**

Sylvie Spewak  
Senior Policy Developer  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (279) 219.3905  
[sspewak@caiso.com](mailto:sspewak@caiso.com)