

Memorandum

To: ISO Board of Governors
From: Roger Collanton, Vice President, General Counsel, Chief Compliance Officer, and Corporate Secretary
Date: April 22, 2026
Re: **Regulatory update**

This memorandum does not require ISO Board of Governors action.

Highlights

- *Commissioner David LeCerte re-nominated to serve as FERC Commissioner for term ending June 30, 2031.*
- *FERC accepts tariff revisions to support day-ahead market enhancements and extended day-ahead market.*
- *FERC approves stipulation and consent decree with Terra-Gen LLC.*

Federal Energy Regulatory Commission

- **Resource Adequacy Modeling and Program Design Initiative (ER26-1593)**

On March 3, 2026, the ISO filed a tariff amendment to implement elements of its Resource Adequacy Modeling and Program Design Initiative. The filing seeks to implement new default rules for the planning reserve margin and capacity accreditation, adopt new informational reporting obligations for resource adequacy eligible capacity not shown as resource adequacy, and retire a legacy informational reporting obligation regarding the dispatch of non-resource adequacy capacity.

- **Delaney-Colorado River Transmission, LLC/Ten West Rate Filing (ER23-2309/ER24-1394/EL26-34)**

The ISO has filed multiple pleadings in this proceeding, including a request for rehearing of the January 2026 Rehearing Order, which determined that Delaney-Colorado River Transmission, LLC/Ten West's rate filing constitutes an initial rate, not a changed rate, and thus is subject to Section 206 of the Federal Power Act, with the burden of proof on intervenors. Evidentiary hearings in this matter have resumed.

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- **North Rosamond Solar, LLC – Petition for Limited Waiver (ER26-1128)**

On February 13, 2026, the ISO filed an answer opposing North Rosamond Solar's petition for limited waiver, which seeks a Commission order directing the ISO to resettle all trade dates from September 2022 through July 2023 even though they fall beyond the ISO's 24-month market resettlement timeline. On April 1, 2026, FERC issued an order denying the request of North Rosmond Solar for a waiver of the ISO's 24-month resettlement timeline

- **EDAM/DAME Implementation Tariff Revisions (ER26-1294)**

On February 6, 2026, the ISO filed a tariff amendment to clarify several areas of the ISO tariff related to its day-ahead market enhancement and extended day-ahead market design. These tariff revisions seek to correct errors, clarify existing practices, and resolve ambiguities. The revisions also address implementation issues that have arisen since FERC accepted the market design, including proposed transitional measures for scheduling and modeling of ISO intertie transactions. On April 8, 2026, FERC issued an order accepting these tariff revisions.

- **Terminus Hydroelectric, LLC v. CAISO – Appeal of Telemetry Sanctions (EL26-41)**

On February 5, 2026, the ISO filed an answer to the tariff waiver filed by Terminus Hydroelectric, LLC, which appeals a tariff-required sanction of \$21,000 for failure to maintain telemetry on the Terminus hydroelectric generator. Terminus argues waiver of this sanction is justified because the Terminus unit was on outage when telemetry was interrupted. In this answer, the ISO disagrees that the facts of this matter support waiver of the tariff-required sanction.

- **North American Energy Standards Board Standards (v.4) (ER25-2603)**

On February 4, 2026, FERC issued an order accepting the ISO's October 24, 2025 supplemental filing in compliance with Order No. 676-K. The order incorporates by reference the latest version of the Standards for Business Practices and Communication Protocols of the Wholesale Electric Quadrant adopted by the North American Energy Standards Board.

- **Notice of Proposed Rulemaking – Standards for Business Practices of Interstate Natural Gas Pipelines (RM96-1)**

On January 20, 2026, the ISO joined the ISO/RTO Council in filing supportive comments on FERC's October 16 Notice of Proposed Rulemaking. The Notice of Proposed Rulemaking proposes to amend its regulations to incorporate by reference changes to Version 4.0 of Standards for Business Practices of Interstate Natural Gas Pipelines adopted by the Wholesale Gas Quadrant of North American Energy

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Standards Board. These revisions would streamline the process for accessing publicly available gas-electric coordination data during extreme cold weather or emergency events.

- **Yolo County v. CAISO (EL26-28)**

On December 11, 2025, the ISO filed an answer disputing allegations of Yolo County's complaint, which appeals a \$96,000 in telemetry non-compliance penalties. On January 6, 2026, the ISO filed a further answer to Yolo County's December 23 answer regarding its complaint and its motion for a default order.

- **Building for the Future through Electrical Regional Transmission Planning and Cost Allocation (Order Nos. 1920, 1920-A, 1920-B) (ER26-704)**

On December 9, 2025, the ISO submitted a filing in compliance with Orders 1920, 1920-A and 1920-B relating to long-term regional transmission planning. On February 4, 2026, the ISO filed an answer to Southern California Edison's comments, which correctly identifies an inadvertent error in the ISO's December 9 filing. In the answer, the ISO agrees to correct the error on further compliance with Order No. 1920, if so directed.

- **WEIM Informational Readiness Certification (ER15-861)**

On April 3, 2026, the ISO filed readiness certifications for Black Hills Power, Inc. and Power Watch, LLC to participate in the Western Energy Imbalance Market commencing May 1, 2026.

Non-conforming regulatory agreements

- **Unexecuted Interconnection Agreement: Southern California Edison/ISO/RTSW Solar Park IV LLC (Sequoia 200 MW Solar and Battery Energy Storage System Project) (ER26-283)**

On March 27, 2026, FERC issued an order accepting the unexecuted Large Generator Interconnection Agreement among Southern California Edison, the ISO, and RTSW Solar Park IV LLC with a commercial operation date of January 1, 2031.

- **Affected Participating Transmission Owner Upgrade Facilities Agreement: ISO/Southern California Edison – Yellow Pine 3 (ER26-1385)**

On February 13, 2026, Southern California Edison (SCE) filed an Upgrade Facilities Agreement between SCE, the ISO, and Yellow Pine Solar III, LLC. On March 24, 2026, FERC issued an order accepting the agreement.

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- **Transmission Exchange Agreement: PacifiCorp/Pacific Gas and Electric/ISO (ER26-1340)**

On February 11, 2026, PacifiCorp filed a transmission service agreement between PacifiCorp, in its capacity as transmission service provider, and PacifiCorp Energy Supply Management, the merchant function of the Company. PacifiCorp's filing states it is ongoing discussions with PG&E and the ISO regarding overall service and coordination plans for the impacted transmission capacity between MALIN500 and RDM500 following expiration of the parties' Transmission Exchange Agreement. The transmission service agreement grants, on a contingent basis, 500 MW of firm, point-to-point transmission service on PacifiCorp's transmission system from the Malin 500 kV line Point of Receipt to the Round Mountain 500 kV line Point of Delivery commencing on January 1, 2028 – the date on which the Transmission Exchange Agreement is scheduled to expire – and continues for a term of five years. On March 23, 2026, FERC issued an order accepting the agreement.

- **Hosted Advanced Network Application Service Agreement: El Paso Electric Co./CAISO (ER26-1113)**

On January 23, 2026, the ISO filed a notice of termination of the Hosted Advanced Network Application Service Agreement between the ISO and El Paso Electric Company after El Paso advised the ISO that it no longer requires hosted advanced network application services and provided written notice of its intent to terminate the Service Agreement. On March 5, 2026, FERC issued an order accepting the termination request.

- **EDAM Load Service Entity Agreement: Bonneville Power Company/CAISO (ER26-1112)**

On January 23, 2026, the ISO filed an EDAM Load Serving Entity Agreement between the ISO and the Bonneville Power Administration to support Bonneville's service of its customers located in the PacifiCorp balancing authority areas when PacifiCorp joins EDAM. On March 17, 2026, FERC issued an order accepting the agreement.

- **Metered Subsystem Aggregator Agreement: Northern California Power Agency/CAISO (ER26-1016)**

On January 12, 2026, the ISO filed an amendment to the Metered Subsystem Aggregator Agreement (MSSAA) among the ISO, the Northern California Power Agency (NCPA), and the NCPA MSSAA Members to update the list of generating units, load following system resources, and contact information for the parties. On February 26, 2026, FERC issued an order accepting the agreement.

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- **Unexecuted Letter Agreement re Assigned Network Upgrades: Southern California Edison – Cluster 14 Rosa Storage Project (ER26-518)**

On December 19, 2025, the ISO filed an answer to Longroad Development Company, LLC's protest regarding Southern California Edison Company's unexecuted Design, Engineering, Procurement, and Construction Letter Agreement. On April 10, 2026, FERC issued an order accepting the unexecuted Design, Engineering, Procurement, and Construction Letter Agreement.

- **Adjacent Balancing Authority Operating Agreement: Salt River Project/CAISO (ER26-748)**

On December 12, 2025, the ISO filed an amendment to the Adjacent Balancing Authority Operating Agreement with Salt River Project to reflect the planned interconnection of the SunZia Transmission, LLC's 500 kV transmission line from the SunZia high-voltage direct current converter station to the Pinal Central substation in Arizona. On February 4, 2026, FERC issued an order accepting the amendment to the Adjacent Balancing Authority Operating Agreement.

California Public Utilities Commission (CPUC)

- **Resource Adequacy Program (R.25-10-003)**

On January 23, 2026, the ISO filed comments in the CPUC's Resource Adequacy (RA) Program proceeding. In these comments, the ISO encourages the Commission to adopt RA requirements that meet a 0.1 loss of load expectation. The ISO also recommends the Commission clarify the inputs to its qualifying capacity calculation methodology for storage resources. Finally, the ISO urges the Commission not to impose restrictions on RA resources for day-ahead market bidding and revenue eligibility.

On March 6, 2026, the ISO filed comments on proposals submitted by parties regarding the highest-priority refinements to the CPUC's RA program. In response to party proposals, the ISO recommends : (1) the CPUC should not allow energy only capacity to meet charging sufficiency requirements until a ISO study demonstrates energy only capacity can charge storage resources; (2) the CPUC should not impose bidding or revenue allocation requirements for reliability capacity and imbalance reserves; (3) the CPUC should adopt Energy Division's resource-specific unforced capacity (UCAP) proposal and implement a UCAP framework in RA year 2028; and (4) the CPUC should ensure that its capacity accreditation methodology for storage resources aligns with the Commission's adopted qualifying capacity counting methodology.

On March 20, 2026, the ISO filed reply comments to urge the CPUC to not adopt proposals that would allow energy only capacity to meet charging sufficiency requirements. The ISO's reply comments also reiterate that the CPUC should not

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impose restrictions on all RA resources for the bidding of, or eligibility to receive revenues from, imbalance reserves and reliability capacity.

On April 3, 2026, the ISO filed its Draft 2027 Local Capacity Technical Report in the CPUC's RA proceeding.

- **Integrated Resource Planning (R.25-06-019)**

On February 6, 2026, the ISO filed opening comments on the Proposed Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for 2026-2027 Transmission Planning Process. The ISO's comments support several of the Proposed Decision's directives. The ISO also recommends the Commission adopt an alternative approach to phase in 6 GW of new procurement.

On February 11, 2026, the ISO filed reply comments on the Proposed Decision. The ISO's reply comments address recommendations from several load serving entities regarding the proposed 6 GW procurement order based on the latest California Energy Commission's 2025 Integrated Energy Policy Report planning forecast. The ISO's reply comments encourage the Commission not to reduce the proposed 6 GW procurement order.

California Energy Commission (CEC)

- **Reliability Reserve Incentive Programs (22-RENEW-01)**

On March 16, 2026, the ISO filed comments on the Revised Draft Demand Side Grid Support Program Guidelines. These comments support the revisions and propose that the Energy Commission require large draft demand side grid support providers to gradually dispatch large aggregations over five minutes to mitigate impacts to system frequency.

- **Integrated Energy Policy Report (24-IEPR-01)**

On February 7, 2026, the ISO filed comments on the Integrated Energy Policy Report Commissioner Workshop on Regional Electricity Markets and Coordination. The ISO's comments address Brattle Group's "Split Market Case" report and encourages future iterations that consider challenges associated with transacting across a seam between two distinct markets as well as the loss of benefits to California consumers associated with a reduced WEIM footprint if participating entities exit the WEIM to join an alternative real-time market.

California Air Resources Board (CARB)

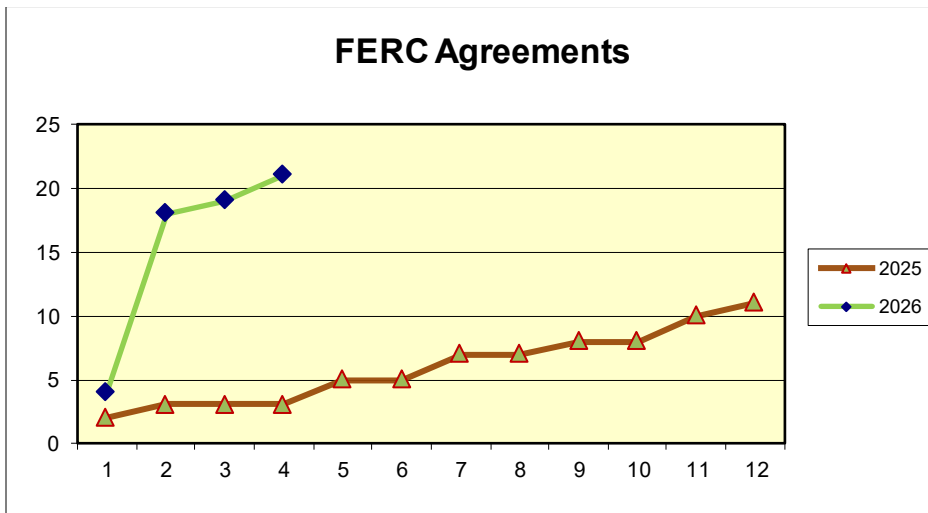
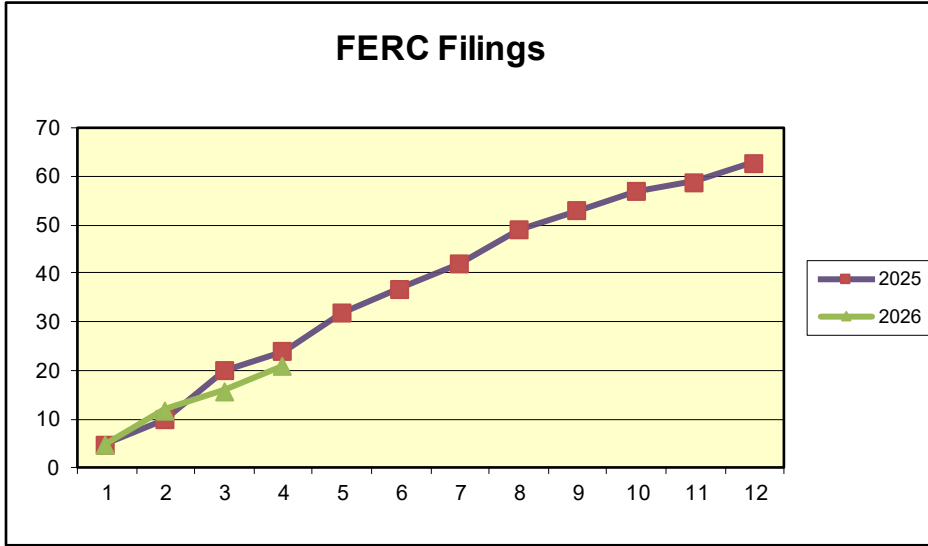
On February 9, 2026, the ISO filed comments regarding the February 26, 2026 Hearing – Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial

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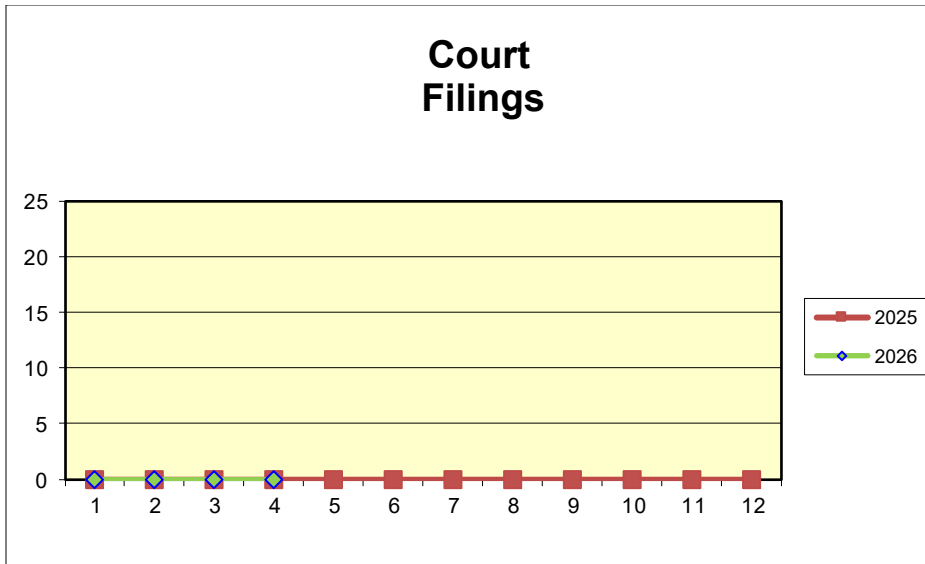
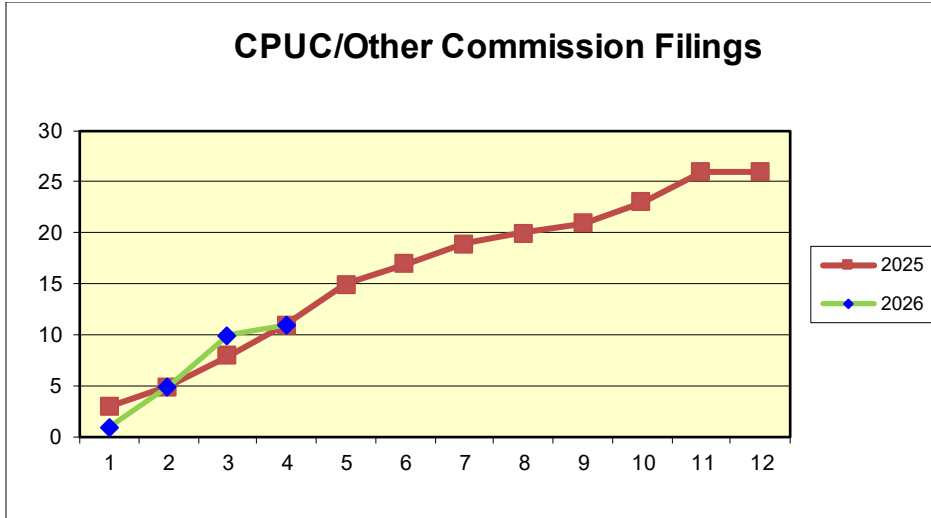
Regulation. The ISO's comments express support for the inclusion of reporting exemptions in CARB's proposed regulations to implement Senate Bills 253 and 261.

On March 9, 2026, the ISO filed comments on the Proposed Amendments – California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. The ISO's comments support the proposed changes to the outstanding emissions calculation and provide additional clarifying information about WEIM and EDAM.

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