



Stakeholder Comments Template

Ancillary Services Focus Group 3

This template has been created for submission of stakeholder comments on the Ancillary Services Focus Group 3, which took place on June 25, 2025. The meeting presentation and other information related to this initiative may be found on the [CAISO.com calendar](https://www.caiso.com/calendar) and under [Miscellaneous Meetings](#).

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

I

Submissions are requested by close of business on **July 9, 2025**

Submitted by	Organization	Date Submitted
<i>James Schrickel</i>	<i>San Diego Gas & Electric</i>	<i>July 9, 2025</i>

Please provide your organization's comments on the following issues and questions.

1. Please provide your feedback on the Ancillary Services Focus Group 3, held on June 25, 2025.

SDG&E appreciates CAISO's continued commitment to improving market participation and optimization of ancillary services. SDG&E understands that the ISO's alternative proposal to the attestation, the formalization of a data request process, is intended to provide alternative means of ensuring that resources can deliver the services they have been awarded.

SDG&E does not oppose the idea of formalizing a data request mechanism, but it would be useful for CAISO to provide examples of the information that it perceives need to be transmitted in order to accomplish the goals of this focus group. A clear, standardized process could give the ISO greater visibility into each resource owner's in-house testing, monitoring, and recertification practices, and should reduce the uncertainty around fleet-wide compliance. However, the details of this data request will be critical to inform SDG&E's ultimate position.

More broadly, we question whether this additional layer of data collection will meaningfully advance CAISO toward its core objective—namely, testing 100% of the resources certified to provide A/S within a reasonable timeframe. We encourage the

ISO to consider how this approach dovetails with—and does not replace—the testing necessary to address the underlying issue with A/S resource response.

Finally, SDG&E welcomes the transition from an ad-hoc focus group to a formal BPM change management process. Developing this data request proposal in the BPM process will allow stakeholders to weigh in on the precise scope, timing, and burden of those requests, and will ensure that any new compliance tool is practical, transparent, and least-intrusive. SDG&E thanks the CAISO for this process modification.

If this effort progresses, we will look forward to working with CAISO and other stakeholders through the BPM process to refine the data request language and enforcement and confirm that it truly advances CAISO's A/S testing goals.