BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
11/04/26
02:53 PM
R2609009

Order Instituting Rulemaking to Implement Assembly Bill 825 Related to Independent Regional Organization.	Rulemaking 26-09-009

WESTLIGHT ENERGY REPLY COMMENTS ON ORDER INSTITUTING RULEMAKING

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November 4, 2026

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I. Introduction

WestLight Energy offers these comments on the *Order Instituting Rulemaking* issued September 23, 2026 in the above captioned proceeding under Rule 6.2. WestLight Energy concurs with the many parties urging the California Public Utilities Commission (the "Commission") to prioritize the issues necessary to be resolved by January 1, 2028, while deferring all other issues to a subsequent track. WestLight Energy cautions that consideration of Issue 2 is likely to be too complex and contentious to be resolved on that time frame.

II. Track 1 should encompass only Issue 1, since Departure procedures are likely to be complex and contentious.

WestLight Energy urges the Commission to limit a Phase 1 solely to those issues necessary to implementation of the Regional Organization for Western Energy ("ROWE") by January 1, 2028. Some parties, including California Public Advocates Office and Western Power Trading Forum, appear to suggest the scope of a Track 1 should also include provisions for withdrawal from the ROWE. However, these issues are likely to be highly complex and contentious. Including these issues in Track 1 may jeopardize the resolution of Issue 1 on a timely fashion.

Issue 2 will be highly complex and contentious, and so should be deferred. Different parties to this proceeding will have very different interests in a regional market and are likely to differ sharply on what requirements should apply to any withdrawal. Parties will differ both on the issues or concerns that might trigger such a process and also on what evidence should be required before any such process would be triggered.

The customers of WestLight Energy, as a Community Choice Aggregator ("CCA"), have particularly acute concerns such that any such decision must involve careful consultation with WestLight Energy and other CCAs. CCAs jointly represent nearly half of customers under

Commission jurisdiction. WestLight Energy's customers have distinct concerns and interests in participation in wider regional market, especially as both affordability and decarbonization have been central to our customers' decision to form WestLight Energy. By the same token, Community Choice customers elsewhere may have similar or distinct concerns, but they make up the half of the relevant customers so their interests must be adequately accounted for in any withdrawal process.

In addition, any withdrawal procedure will necessarily implicate complex issues of contingency planning and interference with contracting, as emphasized by California Public Advocates Office and Western Power Trading Forum. These are critical issues, and they deserve more careful consideration by stakeholders than an accelerated Track 1 can provide for.

III. Conclusion

WestLight Energy respectfully urges the Commission to limit Track 1 solely to those issues that are necessary to resolve by January 1, 2028. These issues are already likely to be complex to evaluate. Incorporating further issues in any Track 1 would compromise both the evaluation of Issue 1 and also impinge on the careful consideration of any other issues included in Track 1.

Respectfully Submitted,

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