# REGULATORY UPDATE FOR NOVEMBER 5, 2025
# (OCTOBER 29 – NOVEMBER 4, 2025)

## I. STATE REGULATORY AGENCIES

## CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC or COMMISSION)[1]

### Proposed Decisions and Resolutions

Resolution (Res) E-5413. This Resolution adopts, with modifications, the proposals of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E), together referred to as the "joint utilities," to establish a pending loads category in the utility distribution planning process, pursuant to Decision (D.) 24-10-030. Advice Letter (AL) 5567-E contains separate proposals from each of the joint utilities on the information and sources that will inform the pending load category, the classification of each of these sources into subcategories within the pending loads category, and how each subcategory will be used in the distribution planning process. This Resolution addresses each proposal separately while directing a common approach for all three investor-owned utilities (IOUs) starting with the 2025-2026 Distribution Planning and Execution Process (DPEP) cycle. Additionally, the Resolution adopts a uniform pending loads framework that allows for individual differences in the sources of input data to identify pending load projects and hot spots, which are geographic areas with high load growth and capacity constraints. The pending loads framework consists of four pending loads categories depending on factors including the type, completeness of the input data, and whether the pending loads fall within an identified hot spot. All utilities will be required to report data on all pending loads included in the distribution planning cycle in the annual Grid Needs Assessment (GNA) and Distribution Upgrade Project Report (DUPR) filings. The utilities will also include data on the hot spots that were identified and utilized in every GNA/DUPR cycle. Each utility will also describe how grid needs and planned investments are re-evaluated every distribution planning cycle based on changes in pending loads. Per D.24-10-030, each utility will collect data for the 2027 pending load evaluation workshop and advice letter.

Application (A.) 25-03-015 (Application of PG&E to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from January 1 through December 31, 2026, and for Approval of Planned Expenditure of 2026 Volumetric Performance Fees). This decision approves PG&E's 2026 Diablo Canyon Power Plant extended operations revenue requirement of $382.233 million. The revenue requirement is allocated to PG&E, SCE, and SDG&E using the allocation factors 44.19 percent, 45.86 percent, and 9.95 percent, respectively. The decision also approves PG&E's Volumetric Performance Fee spending plan.

[1] Per CPUC Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft Resolutions are due 20 days after the draft Resolution appears in the CPUC's daily calendar, per Rule 14.5.

Res E-5414. This Resolution adopts, with modifications, the proposals of PG&E, SCE, and SDG&E, together referred to as the "joint utilities," to establish a scenario planning framework in the distribution planning process. AL 4675-E contains separate proposals from each of the joint utilities on the scenario planning framework pursuant to D.24-10-030, the contents and definition of each scenario, and how each scenario will be used in the annual process. This Resolution addresses each proposal separately while directing a common approach for all three IOUs starting with the 2025-2026 DPEP cycle. The Resolution is separate from, yet closely linked to, Res E-5413 to establish and use a pending loads framework to inform grid upgrades in the distribution planning process. This Resolution is based on the conclusions, definitions, and outcomes of the Pending Loads Resolution.

Voting Meeting

The CPUC held a voting meeting in Sacramento, California on October 30, 2025, at 11:00 a.m. PT. The energy-related results are on the are below:

Item 3. Resolution (Res) G-3606 (SDG&E 2024 Natural Gas Leak Abatement Ratemaking Forecasts and Capital Costs Recovery). This Resolution denies SDG&E's 2024 Natural Gas Leak Abatement (NGLA) ratemaking forecasts as presented in AL 3285-G-A for costs for its 2024 Compliance Plan. SDG&E forecasts a total revenue requirement of $24.859 million in AL 3285-G-A: $22.919 million for Best Practices; $1.29 million for Research, Development, and Demonstration (RD&D) projects; $0.428 million for Program Administration; and $0.222 million for any under-recovered ongoing capital revenue requirements. This Resolution approves no funding for Best Practices because none of the practices is cost-effective. Costs for RD&D are also denied. SDG&E is authorized to record up to $0.428 million for NGLA Program Administration, if applicable, in the NGLA Program Memorandum Account for potential recovery in a future general rate case (GRC) or other proceeding, where it will be subject to a reasonableness review. The Resolution approves $222,000 for unrecovered ongoing capital costs from previously approved Compliance Plans. **Approved.**

Item 4. Rulemaking (R.) 20-05-012 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Self-Generation Incentive Program and Related Issues). This decision establishes the conditions for returning ratepayer funds and closing out all activities related to the ratepayer-funded portion of the Self-Generation Incentive Program (SGIP). The decision also implements the Greenhouse Gas Reduction Fund portion of SGIP as well as conditions for its closure in 2028. Also included in this decision are modifications to existing rules for extending SGIP projects and participation in a qualifying demand response program for SGIP's Residential Solar and Storage Equity budget. **Held to November 20, 2025.**

Item 5. Application (A.)25-04-015 (Application of SDG&E for Authority to Establish a Ratemaking Mechanism for Energization Projects Pursuant to Senate Bill (SB) 410). This decision authorizes SDG&E to establish a new Electric Energization Memorandum Account (EEMA) to record energization costs that are incremental to the energization costs approved in SDG&E's 2024 GRC. SDG&E is authorized to record a total of $51.188 million of incremental costs to the EEMA: $10.561 million in 2024, $20.793 million in 2025, and $19.834 million in 2026. This represents an 83 percent reduction of SDG&E's requested cap of $310.127 million from 2024 to 2026. SDG&E's initial request would have more than doubled the amount of money it is authorized to spend on energization-related projects by its 2024 GRC; this decision authorizes no more than an 18 percent increase. SDG&E is authorized to annually transfer eligible costs to the Electric Distribution Fixed Cost Account for recovery from customers. The decision provides guidance for SDG&E to request revisions to the cap via a petition for modification. Through this decision, SDG&E is authorized, on an annual basis, to begin recovering eligible costs recorded to the EEMA from customers. **Signed, D.25-10-024.**

Item 7. Rulemaking (R.) 18-07-003 (Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program). This decision denies the March 6, 2025 petition to modify D. 20-08-043, filed by the Bioenergy Association of California (BAC). BAC is seeking to extend or remove the end date of the Bioenergy Market Adjusting Tariff (BioMAT) and proposes other programmatic changes, primarily due to underutilization of this high-cost program and availability of other procurement options for bioenergy resources. The decision contends that maintaining the BioMAT end date, December 31, 2025, as directed by the Commission in D.20-08-043, is in alignment with the October 30, 2024 Governor's Executive Order N-5-24 on affordability, and will allow Commission resources to be directed toward more effective clean energy programs. **Held to November 20, 2025.**

Item 9. Resolution (Res) E-5426. This Resolution establishes the IRP Filing Citation Program (IRP FCP). The IRP FCP will apply to all Load Serving Entities subject to the Commission's oversight in an IRP Proceeding. Commission Staff will be delegated authority to issue citations and levy fines for failure to comply with any mandatory filing deadlines and reporting requirements in IRP Proceedings, including the planning and procurement tracks. The penalty amounts set forth in Appendix A of the Resolution are final and not subject to modification on appeal. **Approved.**

Item 10. Application (A.) 24-08-013 (Application of PG&E for a Determination Under Section 851 of Whether a Condemnation of Assets by the South San Joaquin Irrigation District (SSJID) Would Serve the Public Interest). This decision dismisses, without prejudice, PG&E's Application to determine whether, under Section 851, a condemnation of assets by the SSJID would serve the public interest. After PG&E and the SSJID have concluded their eminent domain action currently pending before the San Joaquin Superior Court, PG&E will file an application, consistent with Public Utilities Code Section 851 et seq., for Commission review, and at that time, the Commission will determine the appropriate scope of its review. **Signed, D.25-10-037.**

Item 12. Resolution (Res) E-5420. This Resolution approves, with modification, PG&E's AL 7569-E, which requests Commission approval of two agreements to support the energization of a new 90-megawatt data center load in San Jose, as requested by STACK Infrastructure. These agreements facilitate the construction of new transmission facilities to serve STACK's load. The Commission approves the AL with modifications, finding the agreements necessary and largely appropriate to energize this new load. **Approved.**

Item 14. Petition (P.) 21-07-012 (Petition of the City and County of San Francisco for a Valuation of Certain PG&E Property Pursuant to Public Utilities Code Sections 1401-1421). This decision adopts standards of just compensation that are applicable in this proceeding. The decision adopts the following principles of just compensation: (a) PG&E's shareholders and remaining customers are made whole; (b) the City and County of San Francisco's condemnation of PG&E's property in and around San Francisco constitutes a partial taking; and (c) PG&E may be entitled to business and physical severance damages. **Signed, D.25-10-039.**

Item 16. Resolution (Res) E-5419. This Resolution approves two swap contracts for bundled portfolio content category 1 (PCC-1) renewable energy credits) and energy. SCE is seeking approval to count its purchase contract for June 1, 2025 through May 31, 2026, executed as part of the swap as a bridge toward the energy portion of SCE's Diablo Canyon Replacement procurement requirement under Ordering Paragraph of D.21-06-035. **Approved.**

Item 21. Application (A.) 24-05-002 (Application of West Coast Gas Company to Revise its Gas Rates and Tariffs). This decision grants the Joint Motion for Adoption of the Amended Settlement Agreement (Amended Settlement Agreement) between West Coast Gas Company, Inc., and the Public Advocates Office. The Amended Settlement Agreement results in an increase in Base Rate Revenue of $96,358.46 and total 2025 Test Year Revenue of $1,475,538.94 and resolves all issues in this GRC proceeding. **Signed, D.25-10-041.**

Item 25. Application (A.) 24-05-004 (Application of PG&E for Approval of Natural Gas Curtailment Procedures Pursuant to Decision 23-11-069). Decision 23-11-069, issued in PG&E's 2023 GRC Proceeding, directed the utility to file A.24-05-004, to revise the curtailment procedures in its Gas Tariff and make the revised procedures "similar to" the curtailment procedures of other large energy utilities. The purpose of the Commission's directive and the aim of the utility's application are to expand the utility's curtailment tools by adding tariff provisions for systemwide curtailment procedures similar to what other large California energy companies use. According to the Commission, PG&E currently relies on localized curtailment procedures. This decision corrects that situation by approving the addition of specific systemwide curtailment procedures to PG&E's existing curtailment procedures. **Signed, D.25-10-042.**

Upcoming Workshops and Events

**Virtual Workshop on Southern California Edison's (SCE) Rule 17.** SCE will host a virtual workshop aimed at developing a consensus on the revenue impacts of applying the bill adjustment limitations of SCE's Rule 17, and other comparable rules for the other IOUs, to bundled and unbundled service customers. The workshop will be held on Thursday, November 20, 2025, at 10 a.m. PT. For information about the workshop or to sign up, inquiries should be directed to Lleana Contreras Cevallos (Lleana.C.Cevallos@sce.com) and to Miriam Fishlein (Miriam.Fischlein@sce.com).

**Webinar on Proposed 2026-2027 Transmission Planning Process Portfolios and Preliminary Busbar Mapping Results.** The CPUC staff will host a webinar on November 12, 2025, from 9 a.m. to 12 p.m. PT. The objectives for the webinar are to familiarize stakeholders with proposed portfolios and the busbar mapping process, review the preliminary mapping results for the proposed base case portfolio, and provide an opportunity for stakeholders to ask clarifying questions about the busbar mapping process and preliminary mapping results. Meeting access link can be found here.

## CALIFORNIA ENERGY COMMISSION (CEC)

### 2025 Integrated Energy Policy Report (IEPR)

Upcoming workshops or comment deadlines and recent changes to the workshop schedule are reflected below:

- **November 13, 2025**: IEPR Commissioner Workshop on Load Modifier Results (remote access only). Written comments are due to Docket No. 25-IEPR-03 by 5:00 p.m. PT on November 26, 2025.
- **December 11, 2025**: IEPR Commissioner Workshop on Forecast (remote access only) – *rescheduled from December 2, 2025.*

### Assembly Bill 3 (AB 3) - California Offshore Wind Advancement Act

CEC staff will host two upcoming workshops regarding offshore wind seaport readiness:

- November 13, 2025: 9:00 a.m. to 1:30 p.m. PT (remote access only)
- November 14, 2025: 9:00 a.m. to 3:00 p.m. PT (remote access only)

According to the Notice, CEC staff will provide an overview of AB 3 and summarize progress made to meet AB 3 requirements. A detailed meeting schedule will be posted prior to the workshop at Docket No. 25-AB-03

As background, AB 3 requires the CEC to prepare and submit two reports to the Governor and Legislature, in consultation with various state agencies, including the California State Lands Commission, California Coastal Commission, California Workforce Development Board, Ocean Protection Council, California Department of Fish and Wildlife, Governor's Office of Business and Economic Development, Governor's Office of Land Use and Climate Innovation (formerly Office of Planning and Research), and others.

- Report 1 is a second-phase plan for seaport readiness due by December 31, 2026 (Pub. Resources Code Section 25991.8).
- Report 2 is a feasibility study of achieving 50 percent and 65 percent in-state assembly and manufacturing of offshore wind energy projects due by December 31, 2027 (Pub. Resources Code Section 25991.9).

Each of the upcoming workshops has its own event page (linked above) with remote attendance instructions and a link to the workshop notice and agenda. Written comments are due to Docket No. 25-AB-03 by 5:00 p.m. PT on December 19, 2025.

Clean Transportation Program Investment Plan

On October 27, 2025 the CEC hosted a hybrid meeting of the Advisory Committee for the Clean Transportation Program Investment Plan to discuss the staff draft report version of the 2025–2026 Investment Plan Update for the Clean Transportation Program, including proposed funding allocations. Written comments are due to the Docket Unit by 5:00 p.m. PT on November 7, 2025, under Docket No. 25-ALT-01.

Gas Reliability: Winter 2025-26

On November 3, 2025, CEC staff held a workshop to discuss gas reliability for winter 2025-26. The detailed workshop schedule is available here. Written comments are due to Docket No. 22-OII-02 by 5:00 p.m. on November 17, 2025.

CEC Business Meetings

The next CEC Business Meeting is scheduled for November 12, 2025. The meeting agenda and backup materials are available here.

## CALIFORNIA AIR RESOURCES BOARD (CARB)

CARB Clean Truck Partnership Not Currently Enforceable

U.S. District Judge Dena Coggins issued a partial preliminary injunction in *Daimler Truck North America LLC, et al., v. California Air Resources Board* in the Eastern District of California on Friday enjoining CARB from implementing, enforcing, attempting to enforce, or threatening to enforce the Clean Truck Partnership. Under the 2023 Clean Truck Partnership, various manufacturers committed to gradually adopt zero-emissions technology and eliminate the sale of heavy-duty diesel trucks in accordance with three CARB regulations: the Omnibus Low NOx regulations for heavy-duty engines and vehicles, the Advanced Clean Trucks rule, and the Advanced Clean Fleets rule. Daimler Truck, International Motors, Paccar and Volvo filed the lawsuit on August 11, contending that California is wielding the Clean Truck Partnership agreement "as a backdoor" to force original equipment manufacturers (OEMs) into compliance with CARB's Advanced Clean Trucks, Advanced Clean Fleets and the Omnibus Low NOx regulations despite those programs no longer having valid EPA waivers on the federal level.

Climate Risk Disclosure Laws Update

Although CARB originally announced it would issue proposed rules for the state's climate risk disclosure laws, SB 253 and SB 261, on October 14, 2025, CARB released an update that it will be delaying the rulemaking until Q1 2026 due to "the large volume of public comments staff have received, and given ongoing input related to identifying the range of covered entities." CARB also issued a projected cost of compliance for the laws and shared the disclosure timeline for companies covered by SB 253 to disclose their scope 1 and scope 2 emissions for the first time. Companies covered by SB 253 should expect to report their scope 1 and scope 2 emissions by June 30, 2026.

Meetings and Workshops

On November 6, 2025, CARB will conduct a joint public meeting between CARB, the California Transportation Commission, and the California Department of Housing and Community Development to coordinate their implementation of policies that jointly affect transportation, housing, and air quality, including interagency efforts. Presentations will facilitate open dialogue amongst state agencies and the public.

On November 20, 2025, CARB will conduct a public hearing to consider approving for adoption the proposed amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills (LMR). CARB adopted the LMR in 2010 to reduce methane emissions from municipal solid waste landfills, which are the second-largest source of methane emissions in California. The LMR requires owners and operators to install and optimally operate landfill gas collection and control systems to minimize emissions, monitor surface methane concentration and other performance parameters, repair emission exceedances and other performance issues, conduct source testing of combustion devices used to destroy methane, and report compliance information to CARB and local air districts.

## MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

At its November 6, 2025 agenda meeting, the MPUC will consider: (1) approval of Otter Tail Power Co.'s (OTP) Petition for its renewal of four-year customer eligibility and annual update to its Energy-Intensive, Trade-Exposed (EITE) Rider Surcharge Rate, and of its request to submit its EITE update annually beginning with the April 2026 filing (Docket No. E017/M-25-201); (2) approval of OTP's TMEP Rider (Docket No. E017/M-25-253); (3) approval of OTP's petition to transfer a 1.5 mile portion of the Lake Ardoch to Oslo 115 kV transmission line to Minnkota Power Cooperative, Inc. (Docket No. E017/M-25-218); (4) issuance of an amended site permit, including any additional conditions, for Avangrid Power's repowering project (Docket No. IP6728/WS-09-553); (5) approval of CenterPoint's annual report and its proposed Innovation Act Adjustment charges (Docket No. G008/M-23-215); and (6) granting Basin Electric's request to extend its IRP filing date until October 27, 2027, and whether such delay will necessitate an interim filing (ET6125/RP-25-266).

## OREGON PUBLIC UTILITY COMMISSION, WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, & BONNEVILLE POWER ADMINISTRATION

At its November 13, 2025, agenda meeting, the Oregon Public Utility Commission (OPUC) will consider (1) NewSun's Application for Reconsideration of Portland General Electric's 2025 All-Source Request for Proposals (Docket No. UM 2371), and (2) Stop B2H Coalition's request to rescind or amend Order No. 23-225 (Docket No. UM 2394). Additionally, the OPUC recently approved a rate increase that goes into effect October 31, 2025, resulting from NW Natural's GRC, the decrease in natural gas costs, and other annual adjustments.

Combined, the general rate increase and other annual filings are expected to increase residential customers' monthly bills by $4.38 or 5.4%, for a new monthly bill of about $85.95, although the amount rates will increase for each customer varies depending on customer type and energy usage.

At its November 6, 2025, open meeting, the Washington Utilities and Transportation Commission will consider Avista Corporation's revisions to its Tariff WN U-29, Schedule 162 and Schedule 163, Climate Commitment Act, in accordance with Order 01 (UG-250663).

Also on November 6, 2025, from 2:00 p.m. – 4:00 p.m. PT, the Bonneville Power Administration will conduct pre-proceeding workshops regarding its rate case, BP-26E, to make updates to its 2026 Transmission, Ancillary and Control Area Service Rates Schedules and General Rate Schedule Provisions to implement California Independent System Operator's Extended Day-Ahead Market (EDAM). The BP-26E rate case webpage is available here. The link to access the meeting is available here.

## II. FEDERAL ENERGY REGULATORY COMMISSION (FERC)

### U.S. Department of Energy (DOE) Proposes Large Load and Hydropower Rules to FERC

The DOE sent a letter to FERC proposing a rulemaking on the interconnection of large loads, such as AI data centers, to be connected to the transmission system "in a timely, orderly, and non-discriminatory manner." The letter requests FERC to assert its jurisdiction over large load interconnection. The DOE proposed 14 principles to inform FERC's rulemaking, including subjecting load and hybrid facilities to standardized study deposits, readiness requirements, and withdrawal penalties and expediting the study of large loads that agree to be curtailable. The DOE's letter requests that FERC consider and act no later than April 30, 2026. A more extensive explanation of DOE's proposed rule may be found in our client alert here.

The DOE also sent a letter to FERC issuing a proposed rulemaking on preliminary hydropower licenses, proposing that FERC not deny applications for preliminary permits solely based on opposition from third parties, such as other federal agencies.

### Rejection of Proposed Tariff Changes on Large Load

FERC rejected Tri-State Generation and Transmission Association, Inc.'s proposed tariff changes that aimed to manage projected growth in data center load over the next decade by establishing a biennial study cycle, financial security requirements, and minimum energy and demand thresholds. FERC rejected the proposal on jurisdictional grounds, noting that several provisions intruded into retail rate authority of states, and because the proposal had the potential to be unjust and unduly discriminatory.

## III. INDEPENDENT SYSTEM OPERATORS (ISO) AND REGIONAL TRANSMISSION OPERATORS (RTO)

### CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

**2027 Local Capacity Requirements.** CAISO held a public stakeholder call on November 3, 2025, to discuss the criteria, methodology, and assumptions to be used in the 2027 Local Capacity Technical study. CAISO has posted a draft study manual that addresses these topics. Comments on the study manual are due November 17, 2025. Additional information is available here.

**Intertie Scheduling and RA Imports in EDAM Workshops.** CAISO will host a two-day hybrid stakeholder call on November 5, 2025, and November 6, 2025, to discuss key elements of EDAM Implementation. Additional information is available here.

**Demand and Distributed Energy Market Integration.** CAISO has extended the deadline to submit written comments related to the discussion from the October 16, 2025, working group meeting to November 6. Further information is available here.

**Draft 2026–2028 Policy Roadmap.** CAISO has announced the publication of the draft 2026–2028 Policy Roadmap, which summarizes the policy initiatives and schedules that are planned for the next three years. A virtual stakeholder meeting will be held on November 6, 2025. Additional information is available here.

**Virtual Information Session for Tribes and Tribal Representatives on FERC Order No. 1920 and CAISO Transmission Planning.** CAISO will hold a virtual information session for Tribes and Tribal representatives on FERC Order No. 1920 and CAISO transmission Planning on November 6, 2025, from 8:00-10:00 a.m. PT. The purpose of this initial meeting will be to describe the CAISO, its role in transmission development, and upcoming changes to the transmission planning framework which will seek to incorporate Tribal input. Additional information is available here.

**Day-Ahead Market Enhancements (DAME), EDAM and EDAM CAISO Balancing Authority Participation Rules.** On November 10, 2025, CAISO will offer a continuation of the settlements-focused training session tailored for Scheduling Coordinators involved in, or impacted by, the upcoming Spring 2026 launches of DAME, EDAM, and EDAM ISO Balancing Authority Area Participation Rules. Additional information is available here.

**Price Formation Enhancements.** CAISO has scheduled a Price Formation Enhancements Phase 2 working group call for November 10, 2025. This session will explore the topic of scarcity pricing. Additional information is available here.

**2025-2026 Transmission Planning Process.** CAISO will host a public stakeholder call on November 19, 2025, to present the preliminary assessment of the policy and economic planning study results and brief stakeholders on the projects recommended as being needed that are less than $50 million. Written comments are due by December 5, 2025. Further information is available here.

**ISO-NEW ENGLAND (ISO-NE)**

Meeting

ISO-NE noticed an open meeting on November 5, 2025, from 1:00 to 4:30 p.m. ET held by the ISO-NE's board of directors, which will discuss ISO-NE's 2025 draft Regional System Plan. The meeting will take place at the Hilton Boston Logan Airport Hotel and virtually. Advance registration is required to attend in person. No advance registration is required for virtual attendance.

**MIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO)**

2026 Preliminary Budget Report

MISO published its 2026 Preliminary Budget Report, which projects a required increase of over 11% from its 2025 budget. MISO noted that its cost increases stem from operational and technology improvements to advance market design, reliability, aging systems and infrastructure, automation, processes and cybersecurity, and ensuring competitive compensation for staff retention and recruitment.

2025-26 Winter Readiness Workshop

MISO held its 2025-26 Winter Readiness Workshop on October 29, 2025. In its presentation, MISO projects having sufficient capacity to cover both coincident and non-coincident peak forecast loads and that "MISO is well positioned to handle unplanned events for the upcoming Winter season." A recording of the workshop may be found here.

**SOUTHWEST POWER POOL (SPP)**

SPP Director of Governance, Risk, and Compliance

SPP has created a new position, the director of governance, risk, and compliance and promoted Erin Cullum Marcussen to the role. The position includes oversight of the company's enterprise risk management program, tariff compliance, and corporate obligation compliance.

Western Resource Adequacy Program (WRAP) Participation

The deadline for committing to participate in the first binding season of winter 2027/28 of Western Power Pool's WRAP was October 31, 2025. Sixteen entities have committed to participating in WRAP, representing over 58,000 MW of peak load. SPP operates WRAP on behalf of the Western Power Pool. Calpine, PacifiCorp, Portland General Electric, Eugene Water & Electric Board, Public Service Company of New Mexico, and NV Energy have left WRAP.

**PJM INTERCONNECTION (PJM)**

PJM Winter Outlook

PJM published a statement regarding its Winter Outlook, noting that PJM and its members have adequate power supplies to serve growing demand under expected conditions.

Accepted Revisions to PJM's Reliability Assurance Agreement Among Load Serving Entities

FERC accepted PJM's September 11, 2025 revisions to its Reliability Assurance Agreement Among Load Serving Entities in PJM, which amend the definitions for Gas Combined Cycle Dual Fuel Class and Gas Combustion Turbine Dual Fuel Class to include dual fuel capable gas-fired resources that are similarly situated and comparable to the existing class of dual fuel gas-fired resources.

Four Governors Propose Fast Track Approval Process for Large Load

The Governors from Pennsylvania, Maryland, New Jersey, and Virginia proposed a voluntary limited pathway to PJM under PJM's Critical Issue Fast Path that would qualify large customers for expedited interconnection if they make a financial commitment, such as a Power Purchase Agreement, to enable new generation or uprate or expand an existing resource.

**NEW YORK ISO (NYISO)**

NYISO's Management Committee approved NYISO's 2025-2034 Comprehensive Reliability Plan

NYISO Management Committee voted to approve NYISO's 2025-2034 Comprehensive Reliability Plan (the Plan), which plans ahead 10 years to plan for long-term reliability needs. The Plan now moves to NYISO's Board of Directors for approval.