

May 14, 2025

RE: Leap Comments on Regional Issues Forum Discussion Paper

INTRODUCTION

Leapfrog Power, Inc. ("Leap") is a demand response provider (DRP) founded in 2017 and headquartered in California. The company provides Demand Response (DR) services to residential, commercial, industrial, and agricultural customers throughout the state of California. Through its technology platform, Leap enables distributed energy resource (DER) providers in California to provide grid flexibility, delivering revenue for their customers and integrating additional demand-side resources into the California electricity system. Leap is a registered DRP, as well as a registered Scheduling Coordinator, with the California Independent System Operator Corporation (CAISO).

Leap appreciates the opportunity to provide comments on this Discussion Paper, and it has structured the content of its comments according to the prompts in the Comments Template for the Regional Issues Forum (RIF) Enhancement Project Discussion Paper. Because Leap does not have feedback for every prompt in that template, the comments below address those prompts in aggregate rather than addressing each prompt in turn. Any prompts in that Comment Template that are not addressed below are topics that Leap does not wish to comment on at this time.

COMMENTS

Leap appreciates the RIF's efforts to prepare for the creation of a new Regional Organization with a Stakeholder Representative Committee (SRC), and **it supports the efforts to transition the RIF to the new SRC**. Leap also agrees with the proposal to reorganize the sections of the RIF on a transitional basis to align them with the SRC. This will give stakeholders in that sector additional time to select a representative and make other preparations ahead of the official formation of the SRC. This should be combined with the other suggested change of shifting the RIFs focus towards discussions of issues that are actively pending in the stakeholder processes, which would provide these newly-created sectors with a venue to review and discuss ongoing initiatives that are most relevant to them.

The educational value of this reorganization will be furthered if an indicative voting process is implemented based on the newly reorganized sectors. Allowing the representatives of the newly-created sectors to vote on policy initiatives at CAISO will provide information on these sectors' positions on specific issues and highlight if/how these positions might differ from the larger sectors that they have traditionally belonged to. For example, allowing the Distributed Energy Resources sector to cast an indicative vote during the CAISO stakeholder process would provide insight into how this sectors' perspective deviates from the Independent Power

Producers and Marketers' section it's currently included in on the RIF. Allowing this sector to cast an advisory vote on the final CAISO Policy Catalog would provide similar insights.

Leap supports indicative/advisory voting in both of these spaces, following the reorganization of the RIF along the lines for the SRC. After this reorganization, voting at the final point in the process (i.e. on final proposals or on the final Catalog) would be most appropriate, although this could change in the future. Leap believes this approach will help ensure that the voices of emerging sectors are heard more clearly and consistently throughout the policy development process. By establishing this structure as early as possible, CAISO can build a stronger foundation for stakeholder engagement as the SRC takes shape.

CONCLUSION

Leap **supports** the transition of the RIF to align with the upcoming Stakeholder Representative Committee (SRC), including a reorganization of RIF sectors to mirror the SRC structure and a focus on active policy discussions. It also **supports** implementing indicative or advisory voting for the newly formed sectors to better reflect their perspectives and strengthen stakeholder engagement as the SRC is established.

Respectfully submitted,



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