

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue
Oversight of Electric Integrated Resource
Planning and Procurement Processes.

Rulemaking 25-06-019

**PATTERN ENERGY GROUP, LP COMMENTS IN RESPONSE TO
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON
BUSBAR MAPPING OF ELECTRICITY RESOURCE PORTFOLIOS FOR
2026-2027 TRANSMISSION PLANNING PROCESS**

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November 21, 2025

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Pursuant to the *Administrative Law Judge’s Ruling Seeking Comments on Busbar Mapping of Electricity Resource Portfolios For 2026-2027 Transmission Planning Process* issued by Administrative Law Judge Colin Rizzo on November 3, 2025 (“ALJ Ruling”), Pattern Energy Group, LP (“Pattern Energy”) hereby submits the following opening comments in response to the ALJ Ruling.¹

Pattern Energy appreciates the opportunity to provide its insights on development in key resources areas within the Western Interconnection, such as New Mexico. We applaud the California Public Utilities Commission (“CPUC”) for taking steps to make the portfolio development and busbar mapping processes more transparent, and we also appreciate staff’s efforts to seek input from transmission and resource developers throughout the west. The Integrated Resource Planning (“IRP”) modeling appropriately selects significant quantities of out-of-state resources because they have high-capacity factors that complement California’s in-state portfolio of resources and are readily available to cost-effectively meet near- and mid-term

¹ Please note that concurrently with these comments Pattern Energy has filed a Motion for Party Status in the above-captioned proceeding.

clean energy and capacity needs. The SunZia wind and transmission projects are a prime example of this.

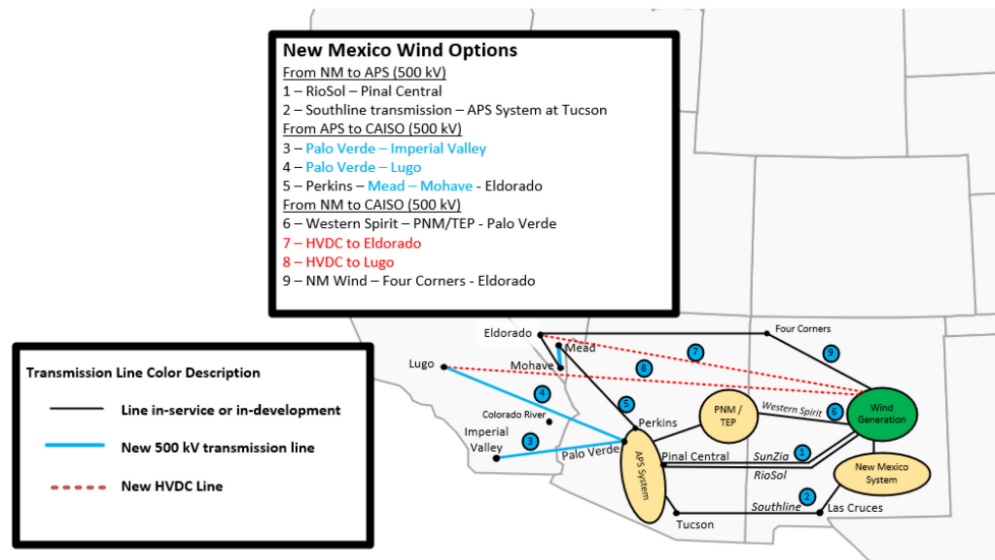
These comments offer Pattern Energy’s insights into regional transmission development and focus on the planning of New Mexico wind delivered to the Lugo substation. While we appreciate that the CPUC is actively planning for the delivery of New Mexico wind, we are concerned that a planning assumption of 1,750 MW delivered to Lugo cannot realistically be met within the 10- or 15-year planning horizons of the IRP and Transmission Planning Process (“TPP”).² We understand that busbar mapping for the past cycles has assumed 1,750 MW of New Mexico wind to be delivered to Lugo through the development of a new high-voltage direct current (“HVDC”) transmission project. This project concept was first proposed in the California Independent System Operator’s (“CAISO”) 2024 20-year outlook.³ It involves construction of a new HVDC line across three states, spanning more than 700 miles. The project was recently contemplated in a recent CAISO presentation in the 2025-2026 TPP (see illustration below).⁴

² See CPUC 2026-2027 Busbar Mapping Data, Out-of-CAISO Summary Tab for SCE Metro – Lugo.

³ See the CAISO’s 2024 20-Year Transmission Outlook (July 31, 2024), Table 5-12, available at: <https://www.caiso.com/documents/2024-20-year-transmission-outlook-jul-31-2024.pdf>.

⁴ See CAISO 2025-2026 Transmission Planning Process presentation (September 24-25, 2025), Slide 38, available at: <https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-2025-2026-TransmissionPlanningProcess-Sep2525.pdf>.

The ISO is also exploring transmission solutions to integrate wind resources from New Mexico



Pattern Energy is not aware of any transmission development that would fulfill this need and continuing to include this planning assumption may lead to inaccurate portrayal of the transmission constraints internal to the CAISO balancing authority that would arise as a result of the delivery of the intended capacity expansion results from RESOLVE. The scope, scale, and potential cost of developing a new 700+ mile HVDC line makes it unlikely to be independently developed as a merchant or Subscriber Participating Transmission Owner project. There is no indication that any experienced developers have already been working on such a project. If developers want to indeed propose an HVDC line to Lugo, they can always do that as an alternative solution in Phase 2 of the CAISO's TPP. If the CPUC and CAISO wish to develop realistic plans about the upgrades they need internally in CAISO, then the 1,750 MW of New Mexico wind currently mapped to Lugo should be remapped to a delivery point along the Pinal Central to Hassayampa electrical path or another SCE Eastern busbar location near the CAISO

border. Doing so may lead to more appropriate no-regrets internal CAISO upgrades which will aid in the integration of resources as they may feasibly be delivered to CAISO.

Pattern Energy appreciates this opportunity to provide comments in response to the ALJ Ruling.

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Respectfully submitted,

/s/

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