



**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
(Filed June 26, 2025)

**COMMENTS OF LS POWER DEVELOPMENT, LLC ON THE 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 Administrative Law Judge Colin Rizzo’s November 3, 2025 Ruling Seeking Comments on Busbar Mapping of Electricity Resource Portfolios for the 2026-2027 Transmission Planning Process (“TPP”), LS Power Development, LLC (“LS Power”) respectfully offers the following comments to the California Public Utilities Commission (“Commission”).

I. Introduction

LS Power generally supports the initial busbar mapping and appreciates the Energy Division’s ongoing efforts to optimize the criteria identified in the Busbar Mapping Methodology. Our comments focus on resource mapping at the Manning Substation. The Manning Substation was approved in the 2021-2022 Transmission Plan as a policy-driven project to support interconnection of additional renewable resources. There is significant interest in Cluster 15 for resource interconnection at the Manning Substation, with ten active interconnection requests totaling about 4,000 MW. Modeling resources at the Manning Substation supports policy needs and provides consistency with prior portfolios. However, the initial busbar mapping does not include any resources mapped to the Manning 500 kV and a very limited amount of resource mapping at the Manning 230 kV.

As the approved project sponsor selected by the California Independent System Operator (“CAISO”) in the competitive solicitation, Phase 3, of its 2021- 2022 TPP, LS Power is developing the Manning Substation and has identified some issues with the initial busbar mapping at Manning, which has resulted in the lack of resource modeling there.

II. Comments

A. Criteria 2 – Substation Level Interconnection

New to the busbar mapping methodology this cycle, the interconnection criteria was expanded to incorporate Participating Transmission Owner (“PTO”) feedback and per-unit cost guide data in order to estimate the economic feasibility of interconnection at individual busbars. This update to the substation level interconnection viability criteria as described in the September 30, 2025 version of the Methodology for Resource-to-Busbar Mapping for the Annual TPP¹ indicates that feedback would be received from PTO’s. However, the information used for this criteria for Manning appears to have come from the Investor Owned Utility (“IOU”) instead of LS Power as the PTO. This has resulted in inaccuracies to the information associated with the Manning Substation as reflected in the Upgrades_lx tab of the Initial Busbar Mapping Dashboard for the 26-27 TPP Base Case.

Corrections required to accurately reflect the current status of the Manning 230 kV and 500 kV in the Upgrades_lx tab of the initial busbar mapping include the following:

- With regard to Available Positions, there are current and future open bay positions available, with a high availability.

¹ [Methodology for Resource-to-Busbar Mapping for the Annual TPP, Ruling version](#) at 22

- For the Logic Flags, expansion is available both within and beyond the existing footprint and there is not a need for a new substation in order to accommodate an expansion.
- For the Upgrade Criteria, there are no short circuit duty limitations, a new substation is not required and overall upgrade criteria should be reflected as low.
- In terms of Upgrade Results, the upgrade assignment should reflect “Additional Positions” with a criteria alignment score of two.

LS Power also recommends that future busbar mapping should include outreach and coordination with all PTOs for evaluation of the substation level interconnection viability criteria.

B. Criteria 7 – Alignment with Previous TPP Portfolios

With regard to consistency with prior TPP portfolios, mapped resource amounts at Manning 500 kV are significantly less than in the previous base case. The Final Busbar Mapping Dashboard for the 25-26 TPP Base Case included 700 MW of solar and 260 MW of battery mapped to the Manning 500 kV. The current portfolios do not include any resources mapped to the Manning 500 kV. Alignment with past portfolios has been consistent over the past several IRP cycles, resulting in increased confidence in CAISO approval of much needed transmission. LS Power recommends that resource mapping at Manning 500 kV be revisited in order to increase alignment with criteria 7 and provide consistency with the prior portfolio.

III. Conclusion

LS Power appreciates the Commission's consideration of these comments on the initial busbar mapping for the 2026-2027 TPP portfolios.

Respectfully submitted November 21, 2025.

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