



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

FILED

11/21/25

04:59 PM

R2506019

Order Instituting Rulemaking to
Continue Electric Integrated Resources
Planning and Related Procurement
Processes

Rulemaking 25-06-019

**COMMENTS BY THE NATURE CONSERVANCY (TNC) ON THE
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON
BUSBAR MAPPING OF ELECTRICITY RESOURCE PORTFOLIOS FOR THE
2026-2027 TRANSMISSION PLANNING PROCESS**

Marybeth Benton
Energy Project Director
California Climate Program
THE NATURE CONSERVANCY
830 S Street
Sacramento, CA 95811
479.685.4584
marybeth.benton@TNC.ORG

Mary C. Loum, Esq.
Attorney for The Nature Conservancy
BROWNSTEIN HYATT FARBER
SCHRECK LLP
916.594.2036
mloum@bhfs.com

November 20, 2025

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

*Order Instituting Rulemaking to
Continue Electric Integrated Resources
Planning and Related Procurement
Processes*

Rulemaking 25-06-019

**COMMENTS BY THE NATURE CONSERVANCY (TNC) ON THE
ADMINISTRATIVE LAW JUDGE’S RULING SEEKING COMMENTS ON
BUSBAR MAPPING OF ELECTRICITY RESOURCE PORTFOLIOS FOR THE
2026-2027 TRANSMISSION PLANNING PROCESS**

Pursuant to the *Administrative Law Judge’s Ruling Seeking Comments on Busbar Mapping of Electricity Resource Portfolios for the 2026-2027 Transmission Planning Process* issued November 3, 2025, The Nature Conservancy (TNC) respectfully submits these comments on the Ruling, preliminary mapping of resources to busbars, and related webinar held on Wednesday, November 12, 2025.

INTRODUCTION

TNC’s comments focus on mapping planned solar resources to least environmental conflict areas of California and the western U.S. to avoid environmental impacts and, relatedly, to help California achieve the planned high solar buildout described in the *Administrative Law Judge’s Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement* issued September 30, 2025 in a way that maximizes predictability and development closer to load. With ~40% of 2036 solar resources expected to come from Arizona, TNC strongly recommends that

the Commission extend land use considerations for solar resources outside of California in the next round of busbar mapping, as described in the September 2025 update to the Methodology for Resource-to-Busbar Mapping for the Annual TPP.¹

DISCUSSION

SOLAR RESOURCES PLANNED FOR ARIZONA

TNC appreciates that staff clarified during the November 12 webinar that “at this stage, busbar mapping has not yet been optimized for land use and environmental criteria.” TNC recommends that, as part of the optimization of busbar mapping for land use and environmental criteria in the next round of busbar mapping updates, CEC and CPUC staff extend environmental review to the areas of Arizona where solar resources are being planned. Relatedly, staff should then update the analysis “Distribution of Lower-Implication Land Percent Change (Solar – All Substations Statewide)” to include the other CAISO areas outside of California where solar resources are being mapped.² Observing the areas near the Arizona substations where resources are being planned at a landscape level of analysis, planned solar resources are potentially located in areas with ecological significance based on the minimal amounts of existing development. Relatedly, TNC recommends that staff publish the spatial data for the CAISO study areas so that stakeholders can better assess planned locations of solar resources and provide more detailed feedback to the Commission about the locations of planned resources. As a broader comment about the level of solar resources planned in Arizona, TNC would like to reiterate our comment in our October 22, 2025, letter that the Commission should also explore potential risks associated with the Base Case portfolio’s current high

¹ Methodology for Resource-to-Busbar Mapping for the Annual TPP September 2025 [mapping- methodology_26-27_redline.pdf](#)

² Land Use and Environmental Analysis for Busbar Mapping Presentation November 12, 2025
[cec nov12 slidedeckbusbar 20251110.pdf](#)

level of reliance on Arizona solar and evaluate the potential to map some of those resources to California's San Joaquin Valley. This would also help develop resources closer to the load in Northern California.

DATA SHARING AND AVAILABILITY

As noted in our comments filed on October 22, 2025, staff should publish latitude and longitude values in the land use evaluations spreadsheet provided by the CEC. TNC would also like to reshare the [geospatial tool](#)³ that TNC created to better understand various potential resource and transmission scenarios from a land use and environmental perspective. In addition to staff releasing tables, TNC recommends that the interagency busbar mapping working group maintain a public web viewer that displays draft busbar mapping results in their spatial form and allows for the downloading of the same spatial data. This would be an important resource to increase public engagement and transparency and to assist a range of stakeholders to participate most fully in busbar mapping.

TNC recommends that the table formats within the sheets in the Full and Compact versions of the Dashboards, in particular the "Summary_byCAISO_zone" sheet, remain consistent from year to year, in order to allow for more direct comparisons of year-to-year changes. The values within the comparison tables provided in the current Dashboards, specifically the "PreviousTPP_SummarybyArea", do not match the tables in the TPP2526 Dashboards. Lastly, TNC recommends that all listed substations and any new substations be identified with an individual unique identifier that persists throughout all tabular and spatial references in order to ensure proper long-term data management practices.

CONCLUSION

³ California Electricity Infrastructure and Busbar Mapping, available at https://experience.arcgis.com/experience/dec364fe13c84fdc8bb10bf84847209f#data_s=id%3Awidget_5_output~widget_3_output%3A0.

TNC appreciates the opportunity to comment on the preliminary busbar mapping results and looks forward to further engaging on this topic in the proceeding.

Thank you for the opportunity to provide these comments.

Dated: November 20, 2025

Respectfully submitted,

/s/ Mary C. Loum

Mary C. Loum, Esq.

mloum@bhfs.com

BROWNSTEIN HYATT FARBER SCHRECK LLP

916.594.2036