

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



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Application 24-07-018 A2407018
(Filed July 30, 2024)

Application of LS Power Grid
California, LLC (U-247-E) for a
Certificate of Public Convenience and
Necessity Authorizing Construction of
the Collinsville 500/230 kV Substation
Project.

**OPENING BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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The California Independent System Operator Corporation (CAISO) submits this opening brief pursuant to the April 21, 2026 *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Ruling) and June 18, 2026 *Administrative Law Judge's Ruling Amending the Schedule*. The CAISO recommends the Commission approve LS Power Grid California, LLC's (LS Power) application for a certificate of public convenience and necessity (CPCN) to construct the Collinsville 500/230 kV Substation Project (Project). The Project serves the public convenience and necessity by mitigating reliability concerns in the Greater Bay Area and is entitled to a rebuttable presumption of need based on the CAISO's determination of need. No party submitted sufficient or persuasive contrary evidence to rebut the presumption.

I. Introduction

In this proceeding, LS Power filed an application for CPCN to authorize construction of the new Collinsville 500/230 kV substation and associated transmission line from the proposed Collinsville substation to PG&E's existing Pittsburg Substation. In its 2021-2022 Transmission Plan approved by the CAISO's Board of Governors on March 17, 2022, the CAISO identified the need for the Proposed Project to mitigate numerous reliability concerns and increase system reliability, as well as also allow for the advancement of renewable generation within the northern Greater Bay Area. The Project and associated CPCN application are entitled to a rebuttable

presumption of need because all four conditions required by the Public Utilities Code, have been met. No party submitted sufficient contrary evidence to rebut that presumption. Because the Project serves the public convenience and necessity by increasing system reliability, the Commission should approve LS Power's CPCN application to construct the Project.

II. Discussion

A. The Project Qualifies for the Rebuttable Presumption in Favor of the CAISO's "Needs Evaluation" (Scoping Ruling Issue 2).

The Commission must establish a rebuttable presumption of need regarding this Project based on the CAISO's need evaluation, as the CAISO and applicant have met all four statutorily-established conditions. California Public Utilities Code Section 1001.1 provides the Commission shall establish a rebuttable presumption if the following conditions are met:

- (a) The Independent System Operator governing board has made explicit findings regarding the need for the proposed transmission project and has determined that the proposed project is the most cost-effective transmission solution.*
- (b) The Independent System Operator is a party to the proceeding.*
- (c) The Independent System Operator governing board-approved need evaluation is submitted to the commission within sufficient time to be included within the scope of the proceeding.*
- (d) There has been no substantial change to the scope, estimated cost, or timeline of the proposed transmission project as approved by the Independent System Operator governing board.*

All four requirements have been met. The CAISO's governing board made explicit findings that the Project was needed for reliability and determined the Project was the most cost-effective transmission solution to meet those reliability needs in the 2021-2022 transmission plan, approved on March 17, 2022. The CAISO became a party to this CPCN proceeding on March 2, 2026 via a written motion (filed February 26, 2026) which was ruled on by the Administrative Law Judge at the prehearing conference. Additionally, LS Power submitted the CAISO's governing board-approved need evaluation in this proceeding with its original application on July 30, 2024. Finally, regarding condition (d), LS Power confirmed in its

application that the Project scope, estimated cost, and timeline approved by the CAISO's governing board remains unchanged for the Project.¹

B. California Forever, LP Has Not Provided Evidence to Rebut the Presumption (Scoping Ruling Issue 2).

The CAISO and LS Power presented clear and convincing evidence that the Project serves the public convenience by providing transmission capability to maintain reliability and meet the Bay Area's existing and future load. This included submission of the 2021-2022 Transmission Plan, which explained the need for the Project and finding it to be the most cost-effective solution to meet those needs, extensive testimony, and discussion on LS Power's application. The CAISO identified multiple thermal overloads on the 230 kV corridor between Contra Costa and Newark substations driven by the California Public Utilities Commission's (CPUC) portfolio of planned resources; the Project provides an additional supply path from the 500 kV system in California into the northern Greater Bay Area, which aligns with the needs identified in the long-term local capacity requirement studies; and the CAISO transmission plan also identified the Project as the preferred alternative to support offshore wind development.²

California Forever, LP (California Forever), through its own testimony, has not met the threshold for rebutting the CAISO's finding of need. A presumption can only be rebutted by satisfactory contrary evidence,³ which California Forever has failed to provide. California Forever's prepared testimony first focuses on current uncertainty around offshore wind in an ill-fated attempt to tie the CAISO's approval of the Project exclusively to the development of offshore wind. This is wholly inaccurate. The Project is not exclusively driven by or dependent on the development of offshore wind; the need for the Project exists independent of offshore wind development.⁴ Next, California Forever's testimony attempts to show that thermal overloads, another driver for the Project, are met through other transmission solutions, however, the CAISO's transmission plan and associated analysis, as well as the CAISO's testimony in this

¹ *Application of LS Power Grid California, LLC (U-247-E) for a Certificate of Public Convenience and Necessity Authorizing Construction of the Collinsville 500/230 kV Substation Project* (filed July 30, 2024) at 12.

² Exhibit CSO-01 *Testimony of Binaya Shrestha on Behalf of the California Independent System Operator Corporation* at 4.

³ "In every context of which we are aware, a presumption can be rebutted only by contrary evidence." *Godoy v. Spearman*, (9th Cir. 2017) 861 F.3d 956, 965; *See also In re Carter* (9th Cir. 1975) 511 F.2d 1203, 1204, requiring evidence to be "satisfactory;" and *Beck v. City of Upland* (9th Cir. 2008) 527 F.3d 853, 863, describing required evidence as "sufficient" and "relevant."

⁴ Exhibit CSO-01 at 6.

proceeding, clearly demonstrate this claim is untrue. California Forever similarly provides insufficient evidence for its claim the CAISO does not justify its drivers of need and fails to recognize the State energy agency inputs, including increasing load projections from the California Energy Commission (CEC), into the transmission planning process.⁵ Regardless of any argument made by California Forever's arguments concerning the future of offshore wind, the thermal overload issues in the area remain, even with other transmission solutions in the region that the CAISO has approved, thus , supporting the need for the Project.⁶

1. Eliminating One Driver for the Project Does Not Eliminate the Overall Need for the Project.

California Forever's prepared testimony distorts the CAISO's transmission planning process by failing to recognize its iterative and holistic nature and choosing instead to isolate and attack individual inputs to the CAISO's transmission planning process. None of the evidence submitted provides accurate or contrary evidence to the CAISO's findings of need because it mischaracterizes how the CAISO identifies and selects transmission solutions.

As highlighted in the CAISO's prepared rebuttal testimony of Binaya Shrestha, submitted June 5, 2026 (Shrestha Testimony), the CAISO's comprehensive transmission planning process considers a portfolio of needs annually through a comprehensive assessment of the system to identify the most effective and cost-efficient solutions to meet a variety of needs. The process, looking at the system as a whole, also relies on and builds upon prior identified needs and approved solutions. Utilizing this comprehensive transmission planning process, the CAISO determined the Collinsville 500/230 kV substation project is needed to address numerous identified transmission constraints, or overloads, within the base portfolio used in the CAISO's transmission planning process, and in addition will support offshore wind integration. The CAISO found a need for the Project *in addition* to other projects that the CAISO found are needed, *i.e.*, Cayetano-North Dublin 230 kV line, Lone Tree-USWP-JRW-Cayetano 230 kV line, and Las Positas-Newark 230 kV line.⁷ Shrestha later confirms in his testimony that these thermal overloads exist in the CPUC portfolio-driven policy studies and will continue to exist regardless of whether or not offshore wind interconnects.⁸ It is inaccurate for California Forever

⁵ CAF-2 *Sur-Rebuttal Testimony of Expert Deborah Galimba* at p. 15.

⁶ Exhibit CSO-01 at 6-7.

⁷ Exhibit CSO-01 at 4.

⁸ Exhibit CSO-01 a 6-7.

to describe a single input into the transmission planning process as determinative of the need for selection of a project because of the comprehensive planning approach the CAISO uses to determine the most cost-effective and efficient solutions for the suite of needs. This unavailing attempt to connect the need for the Project to offshore wind does not constitute contrary evidence necessary to rebut the presumption of need.

2. Thermal Overloads Drivers Are Not Addressed by Other Solutions or Alternative Mitigation Measures.

California Forever next argues that the CAISO has identified and implemented other transmission solutions to address these thermal overload concerns. California Forever's witness states the CAISO subsequently determined in the 2025-2026 Transmission Plan that thermal overload concerns on the 230 kV corridor between Contra Costa and Newark substations are no longer an issue in near-term and long-term scenarios. As witness Shrestha points out in his surrebuttal testimony, however, without the Collinsville substation, the CAISO's reliability assessments show overloads occurring in the mid-term planning scenario and then worsening in the long-term scenario.⁹ Again, the CAISO's comprehensive transmission process is an interactive assessment that relies on and builds upon previously identified needs and solutions and adjusts them as inputs change. In other words, due to the CAISO's prior approval of it in the 2021-2022 comprehensive transmission plan, the Collinsville 500/230 kV Substation Project's continued existence was assumed to be in place in subsequent CAISO reliability assessments. Without the Collinsville 500/230 kV Substation Project, the reliability problems the CAISO identified would remain even following the approval of the additional transmission solutions California Forever references.

California Forever also alleges several alternative mitigation measures, including certain battery storage resources, a project consisting of power flow control devices, and a reconductoring project can alleviate the same thermal overloads. Witness Shrestha's testimony describes why each of these projects does not alleviate the thermal overloads and describes how each was evaluated (or why it was not evaluated) in the transmission planning process.¹⁰ Stated

⁹ Exhibit CSO-01 at 2-3.

¹⁰ Exhibit CSO-02 *Sur-Surrebuttal Testimony of Binaya Shrestha on Behalf of the California Independent System Operator Corporation* at 3-4.

differently, these additional projects do not eliminate the need for the Collinsville 500/230 kV Substation Project, and this evidence is thus not sufficient to rebut the presumption.

3. The CAISO Relies on Inputs from the Energy Agencies

California Forever's witness also attempts to undermine the inputs from California state agencies that the CAISO uses for developing its transmission plan without providing evidence to the contrary. California Forever alleges load growth is "speculative" in the Greater Bay Area and that offshore wind should be removed from the portfolio and the CAISO has failed to justify these inputs. To the contrary, the CAISO used the extensive modeling and testing done by California State energy agencies, required inputs under the CAISO's tariff, as the justification for its determinations.

Among the inputs into the CAISO's comprehensive transmission planning process are demand forecasts developed by the CEC. The CAISO incorporates these load forecasts into its comprehensive process, which reflects increased load growth for Greater Bay Area over the next 15 years. Witness Shrestha's testimony includes the CEC Demand Forecast from the 2025 and 2024 Integrated Energy Policy Report.¹¹ California Forever provides no compelling contrary evidence and essentially seeks to "second-guess" the CEC.

Although the CAISO is aware wind resources off the coast of Humboldt County may face development challenges, the resource portfolios most recently received by the CAISO from the CPUC continue to reflect offshore wind resources off the coast of Northern California in the 15 year-ahead resource portfolios. The CPUC provided the CAISO with these resource portfolios on February 26, 2026. This input continues to inform the CAISO's comprehensive transmission planning process assessment of needs and solutions. Again, California Forever provides no contrary evidence beyond some evidence of hurdles that offshore wind is currently facing. Most importantly, however, as described above, offshore wind is not the primary driver of need for this Project. The Project is needed regardless of offshore wind development, particularly with the more recent load forecast assumptions for Greater Bay Area.

¹¹ Exhibit CSO-02 at 5.

III. Conclusion

The Project, having met all four conditions described in Public Utilities Code Section 1001.1, is entitled to the rebuttable presumption of need. No party submitted contrary evidence sufficient to rebut that presumption.

Respectfully submitted

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