



**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.

R.25-06-019

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION COMMENTS
ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING
COMMENTS ON ELECTRICITY PORTFOLIOS FOR THE 2027-2028
TRANSMISSION PLANNING PROCESS AND POTENTIAL FOR
GEOGRAPHICALLY-TARGETED PROCUREMENT**

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SUMMARY OF RECOMMENDATIONS¹

The Commission should:

- Use the most up to date deliverability, interconnection, and constraint information to ensure the portfolios reflect the best available information;
- Recognize that the portfolios developed for transmission planning, which are sensitive to uncertain inputs and assumptions, serve different purposes than near- to mid-term procurement requirements, which should align with resource procurement and development timelines and accommodating to market supply and prices;
- Adopt the recommended base case with modifications to enable a more feasible portfolio than the original base case that incorporates infeasible amounts of solar and storage and recognize that proactive transmission planning is necessary to support the development of the desired resources for which LSEs have planned in their 2026 IRPs;
- Modify the base case to retain the original intermediate targets of 30 MMT by 2030 and 25 MMT by 2035 to ensure continued progress towards SB 100 goals and utilize the 2025 IEPR Demand Forecast to ensure a feasible portfolio that includes the resources LSEs seek to procure without relaxing interim GHG targets;
- Adopt the timing and lower quantities of OOS resources in the base case, given the lack of demonstrated interest and progress towards developing OOS transmission to the CAISO boarder, so that in-state alternatives are properly planned for in the TPP;
- Work with the CAISO to reform the MIC process and provide stronger signals to the CAISO when MIC expansion is necessary to support OOS generation;
- Reconfigure and/or repurpose transmission that has already been approved for OSW so that it can still provide benefits, including increasing deliverability in Northern California, relieving congestion, supporting the delivery of imports, and relieving local constraints;
- Adopt the recommended sensitivity with modifications to include more gas retirements so that the portfolio identifies resources that are needed to replace emitting baseload resources;
- Update the busbar mapping process to: (1) include Cluster 16 data; (2) conduct an annual survey for entities to communicate their commercial interest in pre-queue projects; and (3) clearly identify more general areas rather than specific points of interconnection, so that projects are not unnecessary prevented from entering the interconnection process or TPD allocation process;

¹ Acronyms used herein are defined in the body of this document.

SUMMARY OF RECOMMENDATIONS continued

- Refrain from issuing geographically targeted procurement at this time, and instead develop a joint framework with the CAISO to assess the trade-offs of wires and non-wires alternatives, given the current level of analysis is insufficient to conclude that a procurement order is the most cost-effective path forward to resolve the constraint; and
- Allow for additional processes to explore the many additional questions associated with geographically targeted procurement, including questions on procurement responsibility, cost responsibility, procurement amounts, etc., before ordering geographically targeted procurement for the Western LA basin.

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California Community Choice Association² (CalCCA) submits these comments pursuant to the *Administrative Law Judge’s Ruling Seeking Comments on Electricity Portfolios for the 2027-2028 Transmission Planning Process and Potential for Geographically-Targeted Procurement*³ (Ruling), dated August 31, 2026.

I. INTRODUCTION

CalCCA appreciates the California Public Utilities Commission’s (Commission) efforts to develop Transmission Planning Process (TPP) portfolios that reflect California’s evolving resource needs and that support the state’s reliability and policy objectives. The TPP plays an important role in identifying the transmission investments necessary to enable load-serving entities (LSE) to meet their future needs and to facilitate a reliable and affordable resource

² California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale’s Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, Valley Clean Energy, and WestLight Energy.

³ *Administrative Law Judge’s Ruling Seeking Comments on Electricity Portfolios for the 2027-2028 Transmission Planning Process and Potential for Geographically-Targeted Procurement*, Rulemaking (R.) 25-06-019 (Aug. 31, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M616/K589/616589361.PDF>.

portfolio that meets the state’s policy goals. The Commission’s recommended base portfolio makes two significant changes to policy assumptions from the 2026-2027 TPP base case by: (1) relaxing the greenhouse gas (GHG) targets for 2030 and 2035 from 30 million metric tons (MMT) and 25 MMT to 38 MMT and 30 MMT, respectively; and (2) unlike in previous TPP cycles, no longer forcing offshore wind (OSW) into the portfolio.

A. CalCCA Generally Supports the Base and Sensitivity Cases with Modifications to Retain the Interim GHG Targets and Use the Most Recent Demand Forecast

This recommended base case should be adopted with modifications to: (1) retain the original interim GHG targets; and (2) use the 2025 Integrated Energy Policy Report (IEPR) Demand Forecast rather than the 2024 IEPR Demand Forecast. The recommended base case includes an increased proportion of non-solar resources due to its more realistic solar build rates. Many community choice aggregators (CCA) seek to procure these non-solar resources, as reflected in their Integrated Resource Plans (IRP), but are not seeing them represented in the market in part due to transmission constraints.

However, CalCCA is concerned that the Commission’s method for developing the recommended base case includes relaxing the GHG targets. The original intermediate targets of 30 MMT by 2030 and 25 MMT by 2035 are important milestones that should be retained to ensure continued progress towards the 2045 Senate Bill 100⁴ goal through proactive transmission planning. While the original base portfolio that relies on the original intermediate targets includes a potentially infeasible amount of solar and storage, it also relies on an outdated load forecast. If this load forecast is replaced by the more recent 2025 IEPR Demand Forecast, a more feasible portfolio

⁴ Senate Bill 100 (SB 100) Ch. 312, Stats. 2018 (De León), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100.

is achieved that includes resources LSEs seek to procure. These changes result in a base case that is similar to the recommended base case without needing to relax the GHG targets.

Other elements of the base case seek to align the portfolio with commercial viability and should be adopted. The timing and lower quantities of out-of-state (OOS) resources in the base case recognizes lack of progress in developing the OOS transmission for delivery of generation to the California Independent System Operator (CAISO) boundary. Refraining from forcing offshore wind into the portfolio ensures the Commission identifies and plans for resources that can realistically support the state's near- and medium-term reliability and policy objectives while preserving flexibility to incorporate OSW as development conditions improve.

The Commission should adopt the recommended sensitivity portfolio with modifications consistent with those recommended for the base portfolio. That is, the sensitivity portfolio should be modified to maintain the original GHG targets and use the 2025 IEPR Demand Forecast. The sensitivity portfolio should also include an increased amount of gas retirements to ensure that the resulting portfolio identifies the resources needed to replace emitting baseload resources as those resources retire.

B. Portfolio Development and Busbar Mapping Should Reflect Evolving Development Conditions and Commercial Viability

Future portfolios and existing transmission investments should reflect evolving development conditions and commercial viability to minimize the risk of stranded investments. To do so, the Commission should work with CAISO to reform the Maximum Import Capability (MIC) process and establish stronger signals regarding when MIC expansion is necessary to support OOS generation. Transmission already approved to support OSW should be evaluated for opportunities to reconfigure or repurpose those investments to provide near- and medium-term system benefits, including increasing deliverability in Northern California, relieving congestion

and local constraints, and supporting the delivery of imports. The busbar mapping process should also be updated to incorporate Cluster 16 data, establish an annual process for entities to communicate their commercial interest in pre-queue projects, and identify broader geographic areas rather than unnecessarily limiting projects to specific points of interconnection (POI).

C. The Commission's IRP Processes Should Encourage Proactive Transmission Planning and Preserve Procurement Flexibility to Respond to Market Conditions

Overall, as the Commission refines the portfolios in the Ruling and develops future portfolios, the Commission should take a balanced approach that encourages proactive transmission development that preserves flexibility to respond to changing market and development conditions, ensures continued progress towards SB 100 goals, and ensures that transmission planning decisions support resources that LSEs can realistically procure and develop. The Commission should recognize the inherent uncertainty associated with long-term planning and ensure that the assumptions underlying the TPP portfolios remain grounded in the best available information and appropriately reflect the different purposes of transmission planning and near- to mid-term procurement requirements.

In particular, the Commission should distinguish between: (1) portfolios used to identify potential transmission needs over a long planning horizon; and (2) procurement requirements that must be responsive to resource development timelines, market supply, and prices. Transmission planning should provide a durable foundation for a diverse resource mix without prematurely translating uncertain long-term assumptions into near-term procurement obligations.⁵ Taken together, these recommendations would allow the Commission to advance

⁵ CalCCA has commented extensively on the need to avoid prescriptive procurement requirements based on modeled portfolios in R.20-05-003. *See, e.g., California Community Choice Association's Comments on Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a*

transmission planning and resource development while maintaining appropriate distinctions between long-term planning assumptions and near-term procurement requirements.

D. The Commission Should Not Adopt Geographically Targeted Procurement Until the Commission and the CAISO Assess the Trade-Offs of Wires and Non-Wires Alternatives to Identify Most Cost-Effective Path Forward to Resolve the Constraint

With respect to geographically targeted procurement, the Commission should refrain from issuing a procurement order at this time. The current analysis does not sufficiently evaluate the tradeoffs between wires and non-wires alternatives to establish that procurement is the most cost-effective solution to the identified constraint. Before ordering geographically specific procurement, the Commission should develop, jointly with CAISO, a framework for evaluating wires and non-wires alternatives and their respective costs, benefits, and tradeoffs. The Commission should also allow additional process to address unresolved questions regarding procurement responsibility, cost responsibility, procurement quantities, and other implementation issues.

In summary, the Commission should:

- Use the most up to date deliverability, interconnection, and constraint information to ensure the portfolios reflect the best available information;
- Recognize that the portfolios developed for transmission planning, which are sensitive to uncertain inputs and assumptions, serve different purposes than near- to mid-term procurement requirements, which should align with resource procurement and development timelines and accommodating to market supply and prices;
- Adopt the recommended base case with modifications to enable a more feasible portfolio than the original base case that incorporates infeasible amounts of solar and storage and recognize that proactive transmission planning is necessary to support the development of the desired resources for which LSEs have planned in their 2026 IRPs;

Reliable and Clean Power Procurement Program, R.20-05-003 (Aug. 14, 2026) (CalCCA August Comments), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M615/K005/615005837.PDF>.

- Modify the base case to retain the original intermediate targets of 30 MMT by 2030 and 25 MMT by 2035 to ensure continued progress towards SB 100 goals and utilize the 2025 IEPR Demand Forecast to ensure a feasible portfolio that includes the resources LSEs seek to procure without relaxing interim GHG targets;
- Adopt the timing and lower quantities of OOS resources in the base case, given the lack of demonstrated interest and progress towards developing OOS transmission to the CAISO boarder, so that in-state alternatives are properly planned for in the TPP;
- Work with the CAISO to reform the MIC process and provide stronger signals to the CAISO when MIC expansion is necessary to support OOS generation;
- Reconfigure and/or repurpose transmission that has already been approved for OSW so that it can still provide benefits, including increasing deliverability in Northern California, relieving congestion, supporting the delivery of imports, and relieving local constraints;
- Adopt the recommended sensitivity with modifications to include more gas retirements so that the portfolio identifies resources that are needed to replace emitting baseload resources;
- Update the busbar mapping process to: (1) include Cluster 16 data; (2) conduct an annual survey for entities to communicate their commercial interest in pre-queue projects; and (3) clearly identify more general areas rather than specific points of interconnection, so that projects are not unnecessarily prevented from entering the interconnection process or Transmission Plan Deliverability (TPD) allocation process;
- Refrain from issuing geographically targeted procurement at this time, and instead develop a joint framework with the CAISO to assess the trade-offs of wires and non-wires alternatives, given the current level of analysis is insufficient to conclude that a procurement order is the most cost-effective path forward to resolve the constraint; and
- Allow for additional processes to explore the many additional questions associated with geographically targeted procurement, including questions on procurement responsibility, cost responsibility, procurement amounts, etc., before ordering geographically targeted procurement for the Western LA basin.

II. THE COMMISSION’S RECOMMENDED BASE CASE AND THE PROCESS FOR DEVELOPING IT DEMONSTRATES THE NEED FOR PROACTIVE TPP PORTFOLIOS AND RCPPP PROCUREMENT FLEXIBILITY

CalCCA understands the Commission’s motivation to modify the inputs and assumptions used to develop the TPP portfolios to “construct a more reasonable base case portfolio.”⁶ The Commission prudently recognized that the initial potential base case was “both unnecessarily

⁶ Ruling, at 13.

expensive to ratepayers and likely unrealistic in its build rates for solar and storage in the near term.”⁷ These concerns, however, also demonstrate the importance of distinguishing the purpose of the TPP portfolios from the purpose of establishing near- and mid-term procurement requirements, including through the proposed Reliable and Clean Power Procurement Program (RCPPP) in R.20-05-003.

The TPP base case is fundamentally a **long-term transmission planning tool**. Its purpose is to identify transmission solutions that can support California’s evolving resource needs and policy objectives under a range of plausible future conditions. Accordingly, the Commission should avoid constraining future TPP portfolios based primarily on near-term resource procurement feasibility in a manner that could delay transmission development. Transmission and interconnection constraints can themselves impede resource development, limit resource diversity, and increase reliance on a narrower set of resources. TPP portfolios should instead identify proactive, least-regrets transmission solutions that expand the set of resources that can ultimately serve California load and provide flexibility as resource development and market conditions evolve.

In addition, the Commission should encourage the CAISO to evaluate transmission solutions that are strategic long-term investments. This would provide the CAISO with the option to pursue transmission that is identified in the 20-Year Outlook early if it provides interim benefits or can facilitate the proactive development of resources in the portfolio. The TPP portfolios provide a holistic, long-term vision of resources needed to support a reliable and clean grid and should be used to build transmission to make those resources reality.

⁷ *Ibid.*

The RCPPP, by contrast, would establish **actual procurement requirements for LSEs** and therefore must account for considerations that are distinct from those used to develop long-term transmission planning portfolios. The Commission should not translate the modeled resource quantities in a TPP portfolio directly into prescriptive procurement obligations. As demonstrated by the recommended base case portfolio, changes to inputs and assumptions can materially change the modeled resource mix. Figure 3, for example, shows reductions in the modeled quantities of offshore wind, OOS wind, conventional geothermal, and location-constrained 12-hour storage relative to the previously transmitted portfolio.⁸ Such changes illustrate that modeled resource quantities are outputs of a planning exercise, not necessarily quantities that LSEs can or should be required to procure.

Procurement requirements established through the RCPPP should instead account for actual resource availability, development and interconnection timelines, transmission availability, market supply, and procurement costs. Prescriptive resource- or narrowly defined attribute-specific requirements based solely on modeled TPP portfolios could constrain LSE procurement flexibility, create opportunities for supplier market power where supply is limited, and require LSEs to procure resources on timelines that are not supported by actual project development. Such requirements could also increase the risk of stranded costs if the assumptions underlying the TPP portfolio subsequently change. The Commission should therefore use the TPP to identify and facilitate the transmission infrastructure necessary to support reliability and clean energy targets under a range of future uncertain outcomes, while establishing RCPPP procurement requirements through a separate process that is responsive to actual market and resource development conditions.

⁸ See Ruling, at 26.

III. CALCCA'S RESPONSES TO QUESTIONS IN SECTION 5 OF THE RULING

Questions Related to the 2027-2028 TPP Recommendations

- 1. Please comment on the modeling assumption updates made for this round of TPP recommendations. Are there other critical assumption changes that you recommend? Be as specific as possible about assumptions and data sources.**

The Commission should improve the modeling assumptions for this portfolio by using the most up to date deliverability and interconnection information. Importantly, the 2027-2028 TPP is the last annual Transmission Plan before CAISO transitions to its FERC 1920 schedule, which will result in comprehensive Transmission Plans every other year, rather than annually.⁹ The transition to this new schedule means that after the 2027-2028 TPP, the next TPP will not result in additional TPD until Cluster 20 in 2030. Accordingly, it is critically important that the 2027-2028 Transmission Plan is based upon the best available information.

The Commission should therefore incorporate the recently released 2026 updates on CAISO constraints.¹⁰ These updates include several significant changes that would impact RESOLVE modeling results. The Commission should also use Cluster 16 intake data to recalibrate resource availability. At a minimum, it should be a key part of busbar mapping along with the under-contract and "Review" resources from LSE 2026 IRP filings.

- 2. Do you support the recommended Base Case for the 2027- 2028 TPP? Provide rationale for your recommendation. If you prefer a different Base Case portfolio, describe it as specifically as possible.**

The Commission should adopt the recommended base case with modifications to: (1) retain the original interim GHG targets; and (2) use the 2025 IEPR Demand Forecast rather than the 2024 IEPR Demand Forecast. The Commission's recommended base portfolio makes two

⁹ See CAISO, *FERC Order No. 1920-A Compliance Update* (Mar. 13, 2025) at 8, <https://www.caiso.com/documents/presentation-ferc-order-no-1920-mar-13-2025.pdf>.

¹⁰ See *Transmission Capability Estimates for Use in the CPUC's Resource Planning Process* (July 15, 2026), <https://www.caiso.com/documents/transmission-capability-estimates-white-paper-2026.pdf>.

significant changes to policy assumptions from the 2026-2027 TPP base case: (1) it relaxes the GHG targets for 2030 and 2035 from 30 million metric tons (MMT) and 25 MMT to 38 MMT and 30 MMT, respectively; and (2) unlike previous TPP cycles, it no longer forces offshore wind into the portfolio. It also makes other modifications to align with commercial development interest and timelines, such as reducing the delay in in-state geothermal to seven years and updating the transmission potential for OOS wind.

CalCCA generally supports the base case given the increased share of non-solar resources in the portfolio relative to the original base case, which included potentially unrealistic solar build rates. CCAs are interested in procuring technologies other than solar and 4-hour storage and, in many cases, have included these resources in their IRPs. However, the availability of these resources at cost-effective prices is limited. This is in part due to transmission constraints. A portfolio should ensure transmission solutions are identified to support the development of these resources and ensure feasible build rates to ensure the plan can be implemented in an affordable manner.

Still, CalCCA is concerned that the Commission's method for developing the recommended base case includes relaxing the GHG targets. The original intermediate targets of 30 MMT by 2030 and 25 MMT by 2035 are important milestones that should be retained to ensure continued progress towards SB 100 through proactive transmission planning. While the original base portfolio that relies on the original intermediate targets includes a potentially infeasible amount of solar and storage, it also relies on an outdated load forecast that, if replaced

by the more recent 2025 IEPR Demand Forecast,¹¹ results in a more feasible portfolio similar to the recommended base case without needing to relax the GHG targets.

CalCCA ran RESOLVE with the 2024 IEPR load forecast and original intermediate targets of 30 MMT by 2030 and 25 MMT by 2035 using the 2027-2028 TPP model, which required 99 GW of new nameplate by 2035. This analysis found that the need for new resources is closer to 80 GW by 2035 if *either*: (1) the interim GHG-emissions targets are relaxed, while maintaining the SB 100 and SB 1020 targets; or (2) the interim GHG-emissions target is retained, and the load forecast is updated from the 2024 IEPR to the 2025 IEPR. This result is demonstrated in Figure 1, below. In all three cases in Figure 1, the GHG emissions are equal to the GHG trajectory because the emissions target is the binding constraint and driving the selected new build.

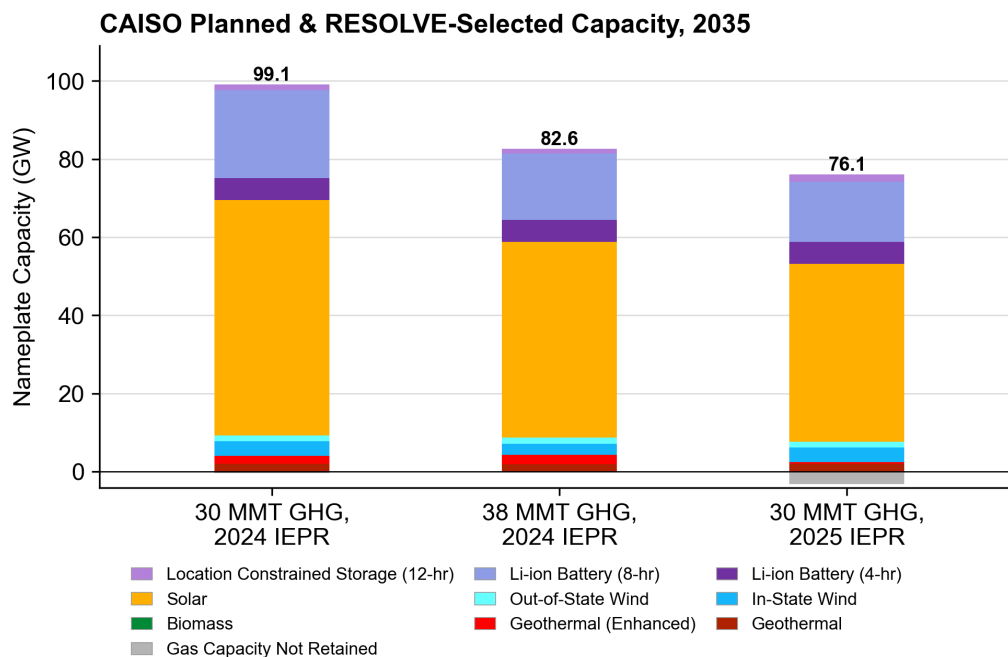


Figure 1: 2035 New Build From 2027-2028 TPP RESOLVE Model Under Different GHG and Load Forecast Scenarios

¹¹ Bailey, Stephanie, Jim Bartridge, Kadir Bedir, Mathew Cooper, Susan Ejlalmaneshan, Tom Flynn, Quentin Gee, et al. 2026. *Final 2025 Integrated Energy Policy Report*. California Energy Commission. Publication Number: CEC-100-2026-001-CMF, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=271454&DocumentContentId=108996>.

Other elements of the base case wisely seek to align the portfolio with commercial viability. The timing and lower quantities of OOS resources in the base case recognize the lack of progress developing the OOS transmission for delivery of generation to the CAISO boundary. Refraining from forcing OSW into the portfolio could help ensure the Commission identifies and plans for resources that can realistically support the state's near- and medium-term reliability and policy objectives while preserving flexibility to incorporate offshore wind as development conditions improve. As described in response to Question 6, whether the Commission retains or removes offshore wind, it is necessary for the Commission and CAISO to evaluate whether Northern California transmission upgrades that have already been approved for OSW are needed for other system or local needs.

3. Please comment on whether the timing and quantities of out-of-state wind and/or geothermal selected in the recommended Base Case portfolio for the 2027-2028 TPP are commercially reasonable and why; also provide rationale for any modifications recommended

CalCCA supports reducing the geothermal delay from ten years to seven years, but recommends the Commission also refrain from remapping a significant amount of geothermal from in-state to out-of-state locations. This timeline aligns more closely with information CCAs have obtained from developers. It will also ensure transmission needed to deliver these locationally constrained resources is not a source of further delay. The inability to interconnect and receive deliverability is a significant roadblock to the delay of geothermal, and delaying inclusion of geothermal in the base case could create a "self-fulfilling prophecy." While CalCCA supports the modified timing of geothermal, it is concerned that the proposed base case relocates a significant amount of geothermal out-of-state. Assuming two GW of geothermal dependent of the High West Transmission project is likely overly ambitious given the status of the project. It

also links a significant amount of near-term capacity to a small set of developers, a single technology, and a single transmission project.

CalCCA also supports the modifications to the timing and quantities of OOS wind. While OOS wind is an attractive resource due to its complimentary output profiles and the difficulties in developing in-state wind, there is significant uncertainty around whether the OOS transmission needed to bring OOS wind to the CAISO boarder will be available to support the significant amount of OOS wind in prior portfolios. Assuming large quantities of OOS resources in the TPP can make the portfolio look attractive on paper while obscuring the substantial transmission-development steps necessary to make those resources deliverable. The ability to access OOS wind will require coordination across multiple jurisdictions, balancing authorities, and LSEs, and faces additional challenges such as permitting, siting, and cost allocation. The TPP portfolios should therefore not assume OOS resources at quantities or on a timeline for which there is not a demonstrated transmission-development pathway so that the state can plan for in-state alternatives when necessary.

- 4. Describe any other out-of-state wind, geothermal, and/or transmission projects that you are aware of, in addition to those already assumed in RESOLVE, that could meet California's needs. Be as specific as possible about assumptions and data sources.**

CalCCA has no comments at this time.

- 5. Comment on any actions the Commission should take to support the development of out-of-state transmission and/or generation to serve California's needs.**

The Commission and CAISO should work together on MIC reform to ensure that LSEs are able to bring out-of-CAISO resources into the CAISO Balancing Authority Area. The current MIC process leaves LSEs uncertain about their MIC allocations until the year-ahead. LSEs can

only lock-in MIC for multiple years if they have an RA contract active in the immediate RA year. This is insufficient to support long-term PPAs with OOS resources.

The Commission should provide stronger signals to the CAISO that MIC is necessary to support OOS generation. MIC can only be expanded if there is existing MIC or planned MIC driven by policy-driven transmission projects. The Commission can facilitate this MIC expansion by including OOS resources in the portfolios when LSEs have signaled commercial interest in procuring these projects.

6. Do you support offshore wind being removed from (i.e., not being forced into) the recommended Base Case portfolio for the 2027-2028 TPP? Why or why not?

CalCCA continues to support the state's efforts to advance emerging technologies, including OSW, that have the potential to contribute to California's long-term energy and climate objectives. At the same time, current signals from the market, the federal administration, and LSEs' IRPs suggest that many challenges remain unresolved before OSW can reach commercial operation at scale. It is therefore uncertain whether OSW will make a material contribution to the state's resource portfolio within the recommended base case's 10–15-year planning horizon.

Accordingly, CalCCA supports the Commission's decision not to force OSW into the recommended base case for the current planning horizon. This approach does not diminish the potential long-term value of OSW; rather, it will ensure that the Commission identifies and plans for resources that can realistically support the state's near- and medium-term reliability and policy objectives while preserving flexibility to incorporate OSW as development conditions improve.

This approach also demonstrates the importance of developing portfolios and Transmission Plans that are robust across a range of future scenarios and minimize the risk of stranded investment. The CAISO already approved transmission to support OSW in the 2023-

2024 Transmission Plan.¹² CalCCA shares the Commission’s interest in preserving the value of these investments and exploring whether they can serve other purposes in the event OSW development occurs later than anticipated.¹³ The Commission and CAISO should therefore perform additional analysis to evaluate how already-approved transmission could be reconfigured or otherwise used to support other system or local needs, including increasing deliverability in Northern California, relieving congestion, supporting the delivery of imports, relieving local constraints, and/or reducing reliance on local gas. Any such analysis should account for the potential future development of OSW and avoid impacting deliverability allocations to resources that are already online, in the queue, or in active development.

7. Do you support the recommended Sensitivity portfolio for analysis in the 2027-2028 TPP? Provide rationale for your recommendation. If you prefer a different Sensitivity portfolio, describe it as specifically as possible.

For the reasons described in response to Question 3 above, CalCCA generally supports the Limited OOS Resources sensitivity case with modifications. Given the uncertainty associated with OOS transmission, including the additional challenges with developing regional transmission and lack of development progress, a limited OOS resource sensitivity would allow the Commission and the CAISO to plan for in-state resource and transmission alternatives if OOS transmission does not develop as previously assumed.

The proposed sensitivity portfolio should be modified in two ways to ensure continued progress towards GHG emissions reductions, planning towards the most up-to-date load forecast information, and fully evaluating how to reduce reliance on gas-fired resources. *First*, the Commission should align the sensitivity case with the base case by: (1) retaining the interim

¹² CAISO, *2023-2024 Transmission Plan* (May 23, 2024), https://stakeholdercenter.caiso.com/InitiativeDocuments/BOARDAPPROVED_2023-2024_TransmissionPlan.pdf.

¹³ See Ruling, at 20.

GHG targets; and (2) using the 2025 IERP load forecast. *Second*, the Commission should increase the amount of gas retirements assumed in the sensitivity so that the portfolio includes resources that are needed to replace emitting baseload resources. CalCCA is concerned that the Commission transmitted a high-gas retirement sensitivity to the CAISO in the 2024-2025 Transmission Plan, but more work is necessary to fully evaluate transmission solutions necessary to reduce dependency on gas resources, especially in local resources. This sensitivity, combined with the recommendations in response to Questions 9 and 17, will help advance the evaluation of transmission and resource alternatives.

8. Comment on the busbar mapping methodology updates included for this TPP cycle. Questions Related to Potential Geographically-Targeted Procurement Requirements in the Western LA Basin

CalCCA supports the inclusion of permitting data and substation upgrade costs into the commercial interest criteria and recommends three additional improvements for this portfolio development cycle. *First*, the Commission should include Cluster 16 data in the busbar mapping in this cycle, including projects seeking both energy-only and full capacity deliverability status to ensure the most complete and current information about where resources are seeking interconnection.

Second, to further enhance the commercial interest criteria, the Commission should conduct an annual survey for entities to communicate their commercial interest in new capacity projects for consideration in the busbar mapping. This could include the LSE commercial interest scoring used in the interconnection process but should also include interest outside of areas with existing or planned deliverability so that a diverse set of technologies, developers, and locations are identified in advance of them entering the interconnection queue. Obtaining pre-queue project status would improve commercial interest datasets, which may currently be limited due to how the new IPE processes limited where projects can apply to enter the queue.

Third, the Commission should modify its busbar mapping process to clearly identify more general areas rather than specific points of interconnection, so that projects are not unnecessarily prevented from entering the interconnection process or TPD allocation process. Identifying specific POI rather than broader areas has proven to be too limiting – especially for locationally constrained resources that cannot easily switch POIs to align with a narrowly mapped portfolio. Many long-lead-time (LLT) resources, such as geothermal resources, have uncertain and complex siting constraints. Locationally constrained resources should be allowed some flexibility in POIs for interconnection intake and TPD reservations. The CAISO has recognized the need for flexibility in its Cluster 16 guidance,¹⁴ and the Commission should align its busbar mapping to reflect a consistent level of flexibility.

9. Is it appropriate for the Commission to issue a geographically-targeted procurement order designed to alleviate the constraint at Mesa identified by the CAISO in the 2025-2026 TPP, instead of leaving it to the CAISO to pursue a wires-based transmission alternative? Why or why not?

No, the Commission should not issue a geographically-targeted procurement order at this time. The level of analysis provided on the tradeoffs between the wires and non-wires alternatives is insufficient to conclude that a procurement order is the best way to address the constraint. The CAISO’s 2026-2027 TPP workshop, held on September 23 and 24, 2026, further indicated that utilizing storage to meet local reliability is still subject to further analysis, and that there are potentially cost-effective wires-based transmission solutions that can be pursued to enhance the local area’s reliability.¹⁵ The CAISO and the Commission must consider the cost of each alternative relative to the lifespan of the asset and other benefits the solutions could provide (e.g.,

¹⁴ CAISO, *Information on Intake and Scoring of Long Lead Time Projects for C16* (Sept. 17, 2026), at 2, <https://www.caiso.com/documents/q-and-a-long-lead-time-resource-for-c16.pdf>.

¹⁵ CAISO, *2026-2027 Transmission Planning Process (September 23-24, 2026)*, at 183.

other constraints the solution could address). Importantly the analysis needs to quantify the system value of transmission alternatives versus resource alternatives, rather than a simple cost check.

Issuing such an order would also risk exposing customers to market power. The Ruling states that the proposed procurement quantity “would meet the CAISO’s identified need only if all projects already in the interconnection queue materialize. If all queue projects do not materialize, there could be a need for an additional transmission solution, even with the proposed procurement order.”¹⁶ A procurement order at the level necessary to resolve the constraint would therefore subject customers to potential market power exertion from suppliers. It is also unlikely that all projects in the queue will materialize, meaning some level of transmission investment may still be needed even if a procurement order was issued. Subjecting customers to these costs without fully understanding the feasibility, costs, and benefits of this solution and its alternatives is not a prudent path forward.

For these reasons, the Commission should not order geographically targeted procurement at this time. Instead, the Commission and the CAISO should jointly assess wires and non-wires alternatives and their trade-offs using the criteria described in response to Question 17 before any geographically-specific procurement is ordered.

10. If the Commission orders geographically-targeted procurement, what amount should the Commission require?

As stated in response to Question 9, the information provided at this stage is insufficient to order procurement of any amount at this time. Before determining whether geographically-targeted procurement should be ordered the Commission and the CAISO should jointly assess wires and non-wires alternatives and their trade-offs using the criteria described in response to Question 17. If a determination is made that a procurement order is necessary following this assessment, the

¹⁶ Ruling, at 34-35.

Commission should conduct additional process to explore the many additional questions associated with geographically targeted procurement, including questions on procurement responsibility, cost responsibility, procurement amounts, cost containment measures, etc.

- 11. If the Commission orders geographically-targeted procurement, which LSEs should be responsible for soliciting the procurement?**

See response in Question 10.

- 12. If the Commission orders geographically-targeted procurement, should the Resource Adequacy Local CPE play any role? If so, what role? If the resources continue to provide the transmission value but cease to provide a local resource adequacy value in the future, should the Local CPE continue to procure the resource? Why or why not?**

See response in Question 10.

- 13. If the Commission orders geographically-targeted procurement, which LSEs should be responsible for paying for the costs of procurement?**

See response in Question 10.

- 14. If the Commission orders geographically-targeted procurement, how should cost recovery be handled (e.g., should the Commission use the Cost Allocation Mechanism or another approach)?**

See response in Question 10.

- 15. If the Commission orders geographically-targeted procurement, what, if any, cost control mechanism and/or market power mitigation mechanisms should the Commission put in place?**

See response in Question 10.

- 16. If the Commission orders geographically-targeted procurement, should utility-owned resources be able to fulfill the need, and if so, what rules or limitations should the Commission place on these types of resources?**

See response in Question 10.

- 17. Should, and if so, how should the CAISO and the Commission approach developing a joint framework to enable future geographically-targeted procurement, to address transmission constraints? What elements are critical for the Commission to consider in creating such a framework?**

The CAISO and the Commission should develop a joint framework to assess wires and non-wires alternatives and their trade-offs before any geographically-specific procurement is ordered. This assessment should:

- Identify transmission alternatives necessary for upgrade to reduce/remove constraints by local area;
- Quantify the cost of transmission upgrades to reduce each constraint per MW by local area;
- Identify the maximum amount of storage, and clean generation to charge the storage, within each local area necessary to reliably operate without emitting resources;
- Identify the suitable land for each type of clean generating technology or storage within the local area;
- With assistance of the CAISO, identify the effectiveness factor of each suitable site; Develop a cost estimate based on 3-5 to develop generation/storage within the local area to address the constraints;
- Evaluate, by local area, which option is the most cost effective and feasible to address clean energy needs of the local areas; and
- Identify the broader system value of each alternative.

Questions Related to Potential GHG Emission Targets for Preferred System Plan Analysis

18. Comment on the appropriate GHG targets for next year's PSP to assume for 2030 and 2035, and any other years recommended, for purposes of analysis. Provide rationale for your recommendation.

As described in response to Question 2 above, CalCCA is concerned that the Commission's proposed method for developing this year's TPP base case includes relaxing the GHG constraints, rather than using more up-to-date load growth assumptions, to ensure feasible build rates. Next year and moving forward, the Commission should evaluate the future trajectory of GHG targets when developing inputs and assumptions (I&A), instead of following the development of the portfolio. This will allow parties to evaluate the proposed GHG targets in the full context of the inputs and assumptions, including load growth assumptions, recent historical GHG emissions trajectory, and other factors, and provide input in advance of portfolio development.

Other

19. Please feel free to comment on any other aspect of this ruling that is not covered by the above questions.

A. The Commission Should Compare the Portfolios to Interconnection Queue Data for the Purposes of LLT Designations in the CAISO's Interconnection Intake Process

The Commission should use interconnection queue analysis to designate resources at LLT for the purposes of interconnection queue intake. The CAISO's Interconnection Process Enhancements (IPE) adopted a scoring process for determining which interconnection requests will enter the queue.¹⁷ Part of this scoring process is a consideration of whether a resource is considered LLT. The CAISO looks to Local Regulatory Authorities to designate resources as LLT.¹⁸ To do this, the Commission should conduct an analysis of the interconnection queue to determine which technologies are not sufficiently represented in the interconnection queue.¹⁹ Resources that are not sufficiently represented should be designated as LLT for the purposes of interconnection intake under the IPE rules.

B. The Commission Should Document Its Process for Identifying Distributed Generation Nodes in the Portfolio for Purposes of the CAISO DGD Study

The Commission should include written documentation in its annual TPP materials that explains the Commission's process for identifying distributed generation (DG) nodes in the portfolio, which serve as the input to the CAISO's distributed generation deliverability (DGD) study, and what role stakeholders can play in the identification process. Each year, the CAISO

¹⁷ CAISO, *2023 Interconnection Process Enhancements, Track 2 Final Proposal* (Mar. 28, 2024), at 65, <https://stakeholdercenter.caiso.com/InitiativeDocuments/FinalProposal-InterconnectionProcessEnhancements2023Track2.pdf>.

¹⁸ *Ibid.*

¹⁹ To accomplish this, the Commission should compare the amounts of each technology in Phase II of the CAISO interconnection queue with the amounts in the recommended TPP portfolio. If a technology is not sufficiently represented in the interconnection queue to cover the portfolio need, the Commission should designate the technology as LLT. CalCCA previously provided an example of the analysis necessary to designate a resource as LLT. See CalCCA August Comments, at 22.

issues a report with the results of its DGD study, explaining how the CAISO studies specific nodes for assignment of deliverability status to DG resources connected or requesting interconnection below those nodes. Per the CAISO's tariff section 40.4.6.3, the CAISO determines and adds DG amounts to the study model by first identifying all DG nodes that have non-zero distributed generation MW in the most recent transmission plan renewable portfolios. However, over the past several years, zero distributed generation has been identified in renewable portfolios for the San Diego Gas & Electric Company (SDG&E) service territory, and thus no nodes in the SDG&E area have been studied by the CAISO for potential DGD. Most recently, in the 2025-2026 DGD Study, the CAISO reported that the 2025-2026 renewable portfolios identified zero MW of generic FCDS distributed generation in the base portfolio for all service areas, meaning only nodes identified by publicly-owned utilities were studied.²⁰

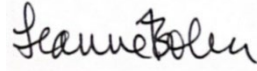
While the CAISO presents annual documentation about the results of the study, the Commission currently does not provide transparent documentation within its annual TPP materials around how the Commission's adopted TPP portfolios serve as inputs to the DGD study process. Further information about the Commission's role in the CAISO DGD study and what assumptions and criteria inform the Commission's determination of distributed generation, including but not limited to distributed solar and storage, for the purpose of this study is needed to help stakeholders better understand and engage with the current process.

²⁰ CAISO, *Resource Adequacy Deliverability for Distributed Generation, 2025-2026 DG Deliverability Assessment Results*, <https://www.caiso.com/documents/2025-2026-deliverability-for-distributed-generation-study-results-report-final.pdf>.

IV. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leanne Bober", is written over a light gray rectangular background.

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

September 28, 2026