Submit comment on 2025-2026 Transmission Planning Process Meeting 9/24 and 9/25

2025-2026 Transmission planning process

1. Provide your organization's comments on the preliminary reliability results for the North area

No comment.

2. Provide your organization's comments on the preliminary reliability results for the South area

No comment.

3. Provide your organization's comments on PG&E's proposed reliability alternatives presentation

No comment.

4. Provide your organization's comments on SCE proposed reliability alternatives presentation

No comment.

5. Provide your organization's comments on GLW proposed reliability alternatives presentation

No comment.

6. Provide your organization's comments on SDG&E proposed reliability alternatives presentation

No comment.

7. Provide your organization’s comments on the high voltage TAC update

No comment.

8. Provide your organization’s comments on the policy assessment update

CAISO Must Study Transmission Solutions for 1,150 MW of Wind in NE California

CalWEA Comments Submitted to CAISO Portal 10-8-25

CalWEA is alarmed that CAISO is proposing not to fulfill the CPUC's request to study transmission solutions, including routes and potential costs, to deliver 1,150 MW of in-state (but out-of-CAISO) northeast California wind resources, and to interface with BPA and NVE about potential regional solutions.[1] The Commission indicated that this planning information would inform its further consideration regarding whether to plan for such transmission solutions in next year's Transmission Planning Process.[2]

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[1] The CPUC stated the following in its Decision 25-02-026 (Feb. 26, 2025) (emphases added):

p. 59 "…1,150 MW of in-California wind that is **mapped to substations in far Northeast California** and outside of the CAISO balancing area …"

p. 62: "[W]e will ask [CAISO] to undertake a special study of the **various routes and combinations** for the OOS wind amounts [including Northeast California wind] to learn more information about the details of **potential routes**. This will allow for analysis of alternative locations for injecting the resources onto the CAISO grid and the potential transmission solutions."

Conclusions of Law "13. It is reasonable to request that the CAISO not trigger the approval of significant new transmission to support Northeast California wind and OOS wind on new regional transmission lines this year, but rather **study these options and interface with regional partners outside of California**, in order to **plan for future development of this transmission with a better understanding of routing options and potential costs."**

Ordering Paragraph 2: "The California Public Utilities Commission (Commission) requests that the California Independent System Operator (CAISO) **analyze the transmission needed for the base case portfolio** reflected in Ordering Paragraph 1, but not yet trigger approval of the solutions necessary to support out-of-state wind resources on new transmission and in-state wind resources that are beyond of the CAISO balancing area and are specifically identified in the results of the mapping of resources to busbars discussed in Section 5 of this decision. Instead, **the Commission recommends that the CAISO conduct the analysis and begin regional discussions (with entities responsible for regional planning and balancing areas outside of the CAISO planning area) about the appropriate siting and potential costs of such upgrades, for further consideration in next year's Transmission Planning Process."**

[2] CPUC D. 25-02-026 at p.63 (emphasis added): "Finally, there is a similar issue with respect to in-state/on-shore wind in Northern California, where 1.1 GW of wind is mapped to the Eastern side of the Sierra Nevada mountains in the NV Energy system (not within the CAISO). This area currently has commercial interest with two projects being developed. However, the resources would currently have to connect through the Bonneville Power Administration (BPA)-NV Energy connection, which has limited capacity, and then be imported into California through the California Oregon Intertie (COI).
"Similar to the OOS wind issues generally discussed above, **for this year's TPP, we are asking the CAISO to do additional study on transmission solutions to upgrade the NVE/BPA system or directly interconnect the CAISO grid to deliver these in-state (but out-of-CAISO) wind resources.** This can advance the identification of transmission locations and costs, without triggering potentially expensive or not-well-targeted solutions. This is also a complex question that requires interfacing with BPA and NVE about potential regional solutions. Thus, **conducting further study this year will prepare us in next year's TPP to actually trigger the appropriate transmission when more details are known."**

In the CAISO's slides for the Sept. 24-25, 2025, Stakeholder Meeting, CAISO acknowledges, in Slide 27, that "CPUC staff recommend CAISO **conduct additional analysis** and defer approving **any potential transmission solutions needed** for the OOS wind resources which include … **1,150 MW of Northern California wind mapped to three NVE substations**." (Emphasis added.) And yet, the diagram on p. 9 shows 1,150 MW as "Out of CAISO Imports" at Malin. Slide 27 states "in 2035 base portfolio and 2040 base and sensitivity portfolio cases, these resources are modeled off-line. Instead, we build a 2040 out-of-state wind sensitivity case to have all these resources on to study any system impact and transmission solutions that are driven by these out-of-state wind resources."

On the stakeholder call, CalWEA's consultant asked CAISO to describe the off-line modeling. CAISO responded that there is sufficient MIC to support Northeast California wind resources and, therefore, they are not modeled in the sensitivity study. These resources are assumed to be included in import flows into CAISO.

CAISO's proposal contradicts, and fails to fulfill, the CPUC's request. MIC availability is very limited, and load-serving entities control its use. It is short-term and thus generally does not support project financing. In any case, MIC is no substitute for transmission upgrades that access Northeastern California.

CalWEA therefore strongly urges CAISO to study 1,150 MW, as the CPUC requested, to inform the Commission's 2026-27 TPP portfolios. CPUC's busbar mapping shows these resources interconnected at a new substation near the existing Leavitt substation in central western Nevada (300 MW), a new substation near the existing Madeline substation (700 MW), and at the Hilltop substation (150 MW).

Recommendation to Study Tesla to Collinsville Upgrade

CalWEA continues to recommend that CAISO consider upgrading the Tesla to Collinsville pathway. All NGBA resources, whether for short-term RA or long-term reserved capacity, would benefit substantially from this relatively modest upgrade. Furthermore, to promote more efficient use of transmission planning deliverability capacity, CAISO should use the ELCC capacity value for offshore wind, approximately 50% of nameplate capacity, rather than 83%, as CAISO currently plans to use without justifying the value.

Reserving Transmission Capacity for Onshore Wind LLT Renewables

CalWEA appreciates CAISO's plan to involve stakeholders, at an upcoming stakeholder meeting, in reviewing the deliverability capacity to be reserved for onshore California wind and other "long lead time" renewables, as requested by the CPUC.

9. Provide your organization's comments on the economic assessment update

No comment.

10. Provide your organization's comments on the TEAMs methodology discussion

No comment.

CalWEA Comments Submitted to CAISO Portal 10-8-25

11. Provide your organization's comments on the CAISO Policy Initiatives Presentation

No comment.

12. Provide any additional comments your organization has on the September 24-25 Transmission Planning Process Meeting

No comment.