



# 2026 Infrastructure Policy Catalog

**July 8, 2026**

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## Background

Over the last several years, the ISO completed an annual policy initiatives workplan via the Policy Initiatives Catalog and Roadmap process. During this annual process, stakeholders submit policy initiative proposals pertaining to ISO policy design and identify their priorities among those proposals. In 2026, the ISO initiated a discrete Infrastructure Policy Initiatives Catalog and Roadmap process to run in parallel with the Market Policy Catalog and Roadmap process, recognizing a slightly different set of issues and conditions for policy development between infrastructure and market policy issues.

The 2026 Infrastructure Policy Initiatives Catalog describes stakeholder infrastructure policy initiative submissions and characterizes stakeholder support for these submissions. Proposed policy initiatives described in the Catalog are considered among several other inputs in the prioritization effort that will yield the Infrastructure Policy Initiatives Roadmap later in 2026, which will describe the infrastructure policy initiatives work plan over the next three years. Figure 1 below describes the milestones of the 2025 Policy Catalog and Roadmap process.

**TABLE 1: POLICY CATALOG & ROADMAP DEVELOPMENT TIMELINE**

|                       |  |
|-----------------------|--|
| <b>January</b>        | 2026 kickoff stakeholder meeting                               |
| <b>February/March</b> | Stakeholders submit proposals to Infrastructure Policy Catalog |
| <b>April</b>          | Stakeholder presentation workshop                              |
| <b>May</b>            | Stakeholder comments   |
| <b>June/July</b>      | Post 2026 Infrastructure Policy Catalog                        |
| <b>July</b>           | Begin 2027-2029 Infrastructure Policy Roadmap development      |
| <b>October</b>        | Release draft 2027-2029 Infrastructure Policy Roadmap          |
| <b>November</b>       | Stakeholder comment period                                     |
| <b>December</b>       | Release final 2027-2029 Infrastructure Policy Roadmap          |

## Stakeholder submissions

In February 2026, 10 stakeholders or stakeholder groups provided 8 submissions<sup>1</sup> for consideration in the 2026 Infrastructure Policy Roadmap and Catalog, all of which are posted on the 2026 Policy Catalog and Roadmap webpage<sup>2</sup>. Given the nature of comments, this resulted in 8 discrete stakeholder submissions from 7 stakeholders or stakeholder coalitions. Submitting stakeholders were then asked to present their submissions during a stakeholder meeting on April 8, 2026, and the ISO gathered

<sup>1</sup> Note that BAMx, DWR, and State Water Contractors provided three separate but very similar submissions on Transmission Access Charge (TAC) structure enhancements, and a group of 7 stakeholders submitted a joint proposal for Maximum Import Capability (MIC) enhancements. Sonoma Clean Power provided two separate submissions. Pacific Gas & Electric (PG&E) submitted comments, rather than submissions, on the ISO's current workload.

<sup>2</sup> [2026 Infrastructure Policy Catalog Initiative](#) – Stakeholder submissions

stakeholder comments on each of the submissions. The ISO reviewed stakeholder comments on the relative level of priority for each of the submissions, which is described below.

**TABLE 2: 2026 INFRASTRUCTURE POLICY CATALOG ITEMS**

| Organization   | Submission Title   |
|--|--|
| Bay Area Municipal Transmission Group (BAMx), California Department of Water Resources, State Water Contractors (3 individual submissions) | Transmission Access Charge (TAC) Structure Enhancements                          |
| California Community Choice Association (CalCCA)   | Energy-Only Resources Seeking Deliverability                                     |
| EDF Renewables   | Alignment of Interconnection and FERC Order No. 1920                             |
| GreenGen Storage   | Long Duration Energy Storage (LDES) as a Transmission Asset                      |
| NextEra Energy Resources   | Streamlined Augmentation of Operational Batteries <sup>3</sup>                   |
| Sonoma Clean Power Organization (SCP)  | Reliability Modernization Initiative – Align RA Program with Evolving Grid Needs |
| Sonoma Clean Power Organization (SCP)  | Robust Adaptability Testing in CAISO Transmission Planning                       |
| The Joint Parties <sup>4</sup>   | Maximum Import Capability (MIC) Enhancements                                     |

The ISO clarifies that the purpose of this catalog is to capture the stakeholder submissions and provide some initial feedback on relative stakeholder prioritization of the various policy topics. In the coming months, the ISO will share its additional infrastructure policy priorities and its own prioritization of these policy issues in the 2027-2028 Infrastructure Policy Roadmap.

<sup>3</sup> NextEra and the Joint Parties submitted the same policy submissions into both the ISO market and infrastructure policy catalogs, and the ISO is capturing them here in the Infrastructure Catalog.

<sup>4</sup> (1) American Clean Power (ACP)– California; (2) the Bay Area Municipal Transmission Group (BAMx), comprised of the City of Palo Alto Utilities and the City of Santa Clara, dba Silicon Valley Power; (3) the California Community Choice Association; (4) the California Municipal Utilities Association; (5) the Six Cities, comprised of the California cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside; (6) Shell Energy North America (US), L.P.; and (7) the Regents of the University of California (UC Regents).

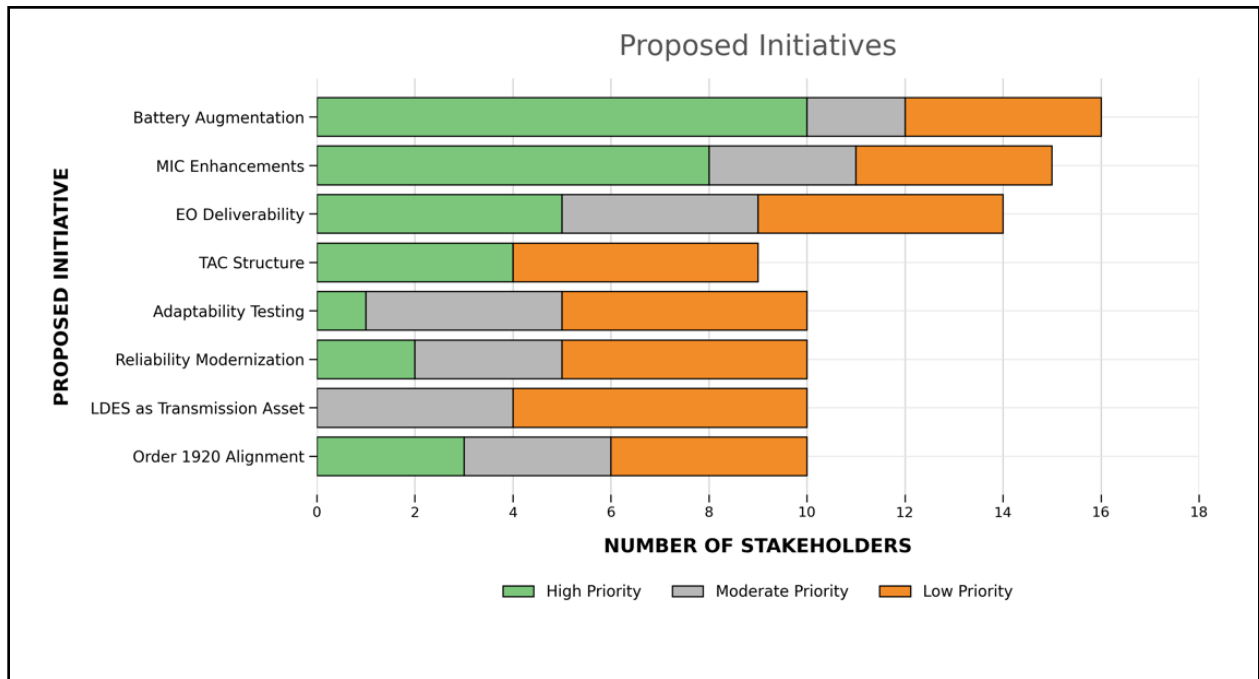
## Stakeholder Engagement

In April 2026, the ISO held a public stakeholder prioritization workshop in which organizations that submitted each of the 8 proposals were invited to present and provide additional context on their proposals, as well as address questions from other stakeholders. Slides and a recording of this meeting are available on the 2026 Infrastructure Policy Catalog and Roadmap webpage<sup>5</sup>.

## Stakeholder Comments

Following this workshop, all stakeholders were invited to submit comments to characterize their own level of interest in engaging in each suggested policy topic.<sup>6</sup> The ISO did not complete a formal poll but rather asked stakeholders to characterize each submission as high, medium, low, or not a priority.

Stakeholder comments expressed the most support for the NextEra Battery Augmentation proposal. Enhancements to Maximum Import Capability also received significant stakeholder interest from both load-serving entities (LSEs) and resource developers. There was support for examining additional pathways for energy only resources to seek deliverability; however, this support primarily came from smaller LSEs. Some of the other submissions (e.g. TAC reform and Order 1920 alignment) either received support from the parties who submitted the policy or support in concept but a relatively low priority ranking from other stakeholders.



<sup>5</sup> [2026 Infrastructure Policy Catalog and Roadmap webpage](#)

<sup>6</sup> [Comments on Stakeholder Presentations](#)

## Next steps

The stakeholder submissions included in the Catalog will be considered for inclusion in the ISO's 2027-2029 Infrastructure Policy Roadmap, and stakeholder feedback on prioritization will be used as one of several inputs to help inform the ISO's internal planning and prioritization process for the Infrastructure Policy Roadmap. The ISO will provide responses to each of the stakeholder submissions in the Roadmap. In particular, the ISO will consider other infrastructure priorities and internal bandwidth for new initiatives in the development of the 2027-2029 Infrastructure Policy Roadmap.

For each initiative listed in the Infrastructure Policy Catalog, the ISO will consider reliability and policy objectives. The ISO will evaluate the feasibility of undertaking the initiative and how to prioritize the initiative against existing obligations and resource availability. The ISO plans to publish the 2027-2029 Infrastructure Policy Roadmap in October 2026 for stakeholder review and comment.

## Appendix A: 2026 Catalog Items: Stakeholder-Submitted Infrastructure Policy Initiative Proposals



## Stakeholder Policy Submissions

Comments on January 29 Kick-off Meeting

2026 Infrastructure policy catalog and roadmap process

### Comment period

Jan 24, 2026, 08:00 am - Mar 02, 2026, 05:00 pm

### Submitting organizations

- Bay Area Municipal Transmission Group (BAMx)
- California Community Choice Association
- California Department of Water Resources
- EDF Renewables
- GreenGen Storage
- NextEra Energy Resources
- Pacific Gas & Electric
- Sonoma Clean Power Organization
- State Water Contractors
- The Joint Parties

## Bay Area Municipal Transmission Group (BAMx)

Submitted on 03/02/2026, 04:56 pm

### Submitted on behalf of

City of Santa Clara dba Silicon Valley Power and the City of Palo Alto Utilities

### Contact

Paulo Apolinario (papolinario@svpower.com)

### 1. Submission title

Transmission Access Charge (TAC) Structure Enhancements

### 2. Has this issue previously been submitted? If yes, please provide a reference.

This issue was considered in the 2016-2018 TAC Structure Review initiative, resulting in a Draft Final Proposal in 2018. This initiative received broad support at the time, including from the CAISO Department of Market Monitoring (DMM), California's three largest investor-owned utilities, municipal

utilities, independent transmission developers, retail marketers, and the California Public Utilities Commission.

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

The current volumetric-only TAC structure does not accurately reflect cost-causation principles and utilization of the transmission system, resulting in inequitable distribution of costs and inefficient system planning. As large loads require system upgrades to interconnect to the California transmission system, and to avoid disproportionate impacts to other retail customers, the CAISO must ensure transmission costs paid by all customers accurately reflect system costs. A hybrid TAC structure using both a volumetric component and peak demand component supports the efficient and equitable expansion of the transmission system and supports integration of flexible loads by incentivizing customers to adjust use during periods of high system demand.

**4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The proposed TAC Structure Enhancements initiative would review the existing volumetric TAC design and assess the equity of cost allocation under the current structure and under a hybrid TAC structure. The initiative should also consider the influence that TAC structures have on transmission investment and cost allocation as large load customers interconnect to the CAISO grid.

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

The current volumetric TAC structure does not create an incentive to reduce electricity consumption during periods of high system demand. This likely leads to additional transmission investment that would not be required if customers are incentivized to reduce use of the transmission system during peak demand hours. Implementing a hybrid TAC structure would realign incentives around system peak hours and reduce the need for additional resource builds that may be required under a volume-based TAC structure.

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

The 2025 SB 100 Joint Agency Report<sup>[1]</sup> demand forecast shows dramatic load growth over the 2026-2045 period driven by fuel switching and interconnection of large loads. By the end of the forecast horizon, California loads switch from summer-peaking to winter-peaking. As additional customers look to charge their electric vehicles and run their heat pumps during peak hours, and additional large loads come online, it is critical to address the incentives to use energy during peak demand periods.

[1] <https://www.energy.ca.gov/sb100>

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

Solutions were developed during the 2016-2018 TAC Structure Review initiative. We recommend using the 2018 Draft Final Proposal as a starting point for this TAC Structure Enhancements initiative.

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## California Community Choice Association

Submitted on 03/02/2026, 12:53 pm

### Contact

Lauren Carr (lauren@cal-cca.org)

### 1. Submission title

Energy-Only (EO) Resources Seeking Deliverability

### 2. Has this issue previously been submitted? If yes, please provide a reference.

Yes, California Community Choice Association (CalCCA) submitted this issue in its March 12, 2025, comments to the 2025-2026 Transmission Planning Process (TPP) Draft Study Plan.<sup>[1]</sup> As a result, the CAISO included this issue in its Interconnection Process Enhancements (IPE) 5.0 and developed a proposal to allow operational EO projects to seek deliverability through the power Purchase Agreement (PPA) group or conditional allocation group.<sup>[2]</sup>

CalCCA appreciates progress made on this issue but remains concerned that the California Independent System Operator's (CAISO) forthcoming final proposal will not result in a viable pathway for EO projects to obtain deliverability. This is because the Final Proposal is expected to limit deliverability allocations to EO projects in which there is already available transmission plan deliverability (TPD), and not where deliverability network upgrades are necessary to make the projects deliverable. Given existing deliverability is scarce,<sup>[3]</sup> the CAISO's proposal may have limited usefulness if commercially operational EO resources are located in areas without existing TPD. For these reasons, the CAISO should commit to exploring enhancements necessary to make EO resources fully deliverable.

[1] CalCCA Comments on the Draft Study Plan and February 26, 2025, Stakeholder Meeting (March 12, 2025), <https://stakeholdercenter.caiso.com/Comments/AllComments/173f349e-e423-4ce0-8311-f976a29d85b6#org-421dd98b-5b20-4ac2-8c96-8f6327f2077c>.

[2] CAISO, *Interconnection Process Enhancements 5.0 – Addendum to the Final Proposal* (Feb. 9, 2026), <https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-Interconnection-Process-Enhancements-5-0%E2%80%93Addendum-to-the-Final-Proposal-Feb-09-26.pdf>.

[3] The CAISO Points of Interconnection Heatmap shows that available TPD in the Cluster 15 Phase 1 scenario is extremely limited, <https://www.caiso.com/poi-heatmap/>.

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

Resources must be studied for deliverability to ensure that the electricity produced at its location can be delivered to the aggregate of load. TPD allocations are a critical part of project development because resources must obtain TPD to provide resource adequacy (RA) and meet California Public Utilities Commission (CPUC) procurement obligations. Available TPD is scarce, with a majority of substations having no deliverability to allocate to new projects without upgrades to existing infrastructure. These limitations, if left unaddressed, have the potential to jeopardize the state's ability to bring new resources online to support reliability requirements established in the Resource Adequacy (RA) and Integrated Resources Planning (IRP) processes and clean energy goals established by statute.

The CAISO should therefore enhance the policy adopted in IEP 5.0 to remove barriers to using the proposed pathway, including limitations on available TPD. The CAISO should explore future pathways for EO projects behind constraints to seek deliverability, particularly where projects have made commitments with LSEs or where projects are aligned with local regulatory authority policy needs. This will ensure sound investments in deliverability network upgrades that support reliability and policy objectives.

**4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

This initiative would consider enhancements to ensure the pathway for converting an EO project to a deliverable project can be used. It would evaluate the policy adopted in IPE 5.0 and determine what barriers to using the proposed pathway, including limitations on available TPD, are preventing EO projects from seeking and obtaining deliverability. The CAISO would explore future pathways for EO projects behind constraints to seek deliverability, particularly when projects have made commitments with LSEs or when projects are aligned with local regulatory authority policy needs.

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

Deliverable resources are necessary to support forthcoming IRP and RA reliability needs. The CPUC has recently identified a 6,000 megawatts (MW)<sup>[1]</sup> reliability need between 2029-2032 and has ordered CPUC-jurisdictional LSEs to procure new resources to meet this reliability need.<sup>[2]</sup> Capacity eligible to satisfy the CPUC's procurement order must be deliverable or paired with a deliverable resource. In addition, RA capacity has been scarce for the last few years. While recent build has helped, load growth may account for all of the recently built capacity, requiring more RA to be procured. Given a choice between pursuing uncertain imports for RA, building a new resource, or contracting with an existing EO resource to provide incentive to pursue network upgrades to become deliverable, more competition for providing RA will benefit consumers in reaching their reliability goals affordably. In fact, it may be that converting an EO facility to fully deliverable is the quickest, most certain, and most cost-effective way to meet RA needs since the resource is already in California, is operational, and has an EO contract to address all costs except the costs of network upgrades.

[1] The need is denominated in Net Qualifying Capacity and since the resources are likely to come from non-emitting resources, the amount of installed capacity will be significantly greater.

[2] Proposed *Decision Requiring 2029-2032 Electric Resource Procurement And Transmitting Portfolios For 2026-2027 Transmission Planning Process*, R.25-06-019 (Feb. 26, 2026) at 2: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M600/K854/600854771.pdf>.

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

This issue should be addressed urgently in the next IPE initiative. The CPUC has recently identified a 6,000 MW reliability need between 2029-2032 and has ordered CPUC-jurisdictional LSEs to procure new resources to meet this reliability need.<sup>[1]</sup> Capacity eligible to satisfy the procurement order must be deliverable or paired with a deliverable resource. Likewise, RA requirements also require resources to be fully deliverable to count.

A viable approach to converting EO resources to deliverable resources could help expand and expedite opportunities for developers to finance and construct projects without a TPD allocation. Constructed and operational projects may be more viable than earlier stage projects under development, may be able to provide deliverable capacity more quickly than earlier stage projects, and should be allowed to compete against other projects in the interconnection intake process and TPD allocation process to contribute to the state's RA requirements.

[1] *Ibid.*

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

The CAISO should evaluate TPD requests from EO projects through the process established in IPE 5.0 to determine whether these requests typically result in deliverability allocations or whether enhancements to the pathway are necessary to make it useful. In addition, the CAISO should examine the desire of EO resources to transition to full deliverability and the barriers that the current process presents to doing so.

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

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**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## **California Department of Water Resources**

Submitted on 03/03/2026, 12:33 pm

Contact

Thomas Vargas (thomas.vargas@water.ca.gov)

## 1. Submission title

Transmission Access Charge (TAC) Structure Enhancements

## 2. Has this issue previously been submitted? If yes, please provide a reference.

Yes, this issue has been previously discussed through the CAISO Policy Initiative Process, where it received support from numerous stakeholders. It was subsequently formally submitted by stakeholders for further consideration, including the California Department of Water Resources' State Water Project (CDWR-SWP).

CAISO first initiated formal examination of potential changes to the Transmission Access Charge (TAC) beginning in 2015–2016, through the Transmission Access Charge Options Initiative and the Review Transmission Access Charge Wholesale Billing Determinant Initiative. Stakeholders expressed concerns that the existing purely volumetric TAC, assessed on each MWh of metered internal end-use load and exports, no longer reflected transmission system cost causation, given changes in system usage, increasing reliance on flexible resources, and growing divergence between energy consumption and contribution to coincident system peak.

Building on those efforts and to address stakeholder requests for a comprehensive review, CAISO launched the Transmission Access Charge Structure Enhancements Initiative in 2017 to conduct a comprehensive technical and policy evaluation of alternative TAC billing determinants. The initiative examined whether continued reliance on a volumetric-only charge appropriately aligned transmission cost recovery with the drivers of transmission investment and usage, and whether incorporating coincident peak demand and other non-energy-based factors could improve cost causation, equity among load-serving entities, and consistency with other CAISO cost allocation frameworks, including Resource Adequacy capacity obligations.

The initiative culminated in a Draft Final Proposal issued in September 2018, which recommended a hybrid TAC structure that would retain a volumetric component while introducing a demand-based element tied to the coincident system peak<sup>[1]</sup>. The proposal also evaluated whether the billing determinant for internal load should be modified to account for load offset by distributed energy resources, recognizing that behind-the-meter generation reduces volumetric energy consumption without necessarily reducing contribution to system peak or long-term transmission investment needs. CAISO's analysis concluded that a hybrid approach would better align TAC recovery with transmission cost drivers, improve rate stability, and reduce cost shifts among transmission users.

The Draft Final Proposal reflected extensive stakeholder engagement and technical analysis and received broad support from a wide range of stakeholders, including CAISO's Department of Market Monitoring, the California Public Utilities Commission, investor-owned utilities, municipal utilities, and customer and public power interests. Rather than advancing the proposal for Board consideration, CAISO placed the initiative on hold in late 2018 to prioritize the development and implementation of the Extended Day-Ahead Market (EDAM), citing the need to ensure consistent treatment of transmission cost recovery as the market footprint expanded. The initiative was neither rejected nor withdrawn, and no other policy initiative superseded it.

In the 2020 Final Policy Initiatives Catalog, the initiative was included under Section 5: Initiatives Currently Underway and Planned as a committed item, with anticipated Board consideration identified for 2020. The catalog description reiterated the technical scope of the initiative, including evaluation of whether the TAC should remain purely volumetric or incorporate other factors such as peak demand, and whether the internal load billing determinant should be modified to account for load offset by distributed energy resources<sup>[2]</sup>. CAISO stated that the Draft Final Proposal was complete but on hold pending policy development for the Extend Day-Ahead Markets to EIM Entities

initiative to ensure consistent treatment of transmission cost recovery across an expanded market footprint.

In 2021, CAISO again carried TAC Structure Enhancements forward in the 2021 Policy Initiatives Catalog under Section 5: Initiatives Currently Underway and Planned, maintaining its committed status and continuing to describe the draft final proposal as complete but on hold pending policy development for the Extend Day-Ahead Markets to EIM Entities policy. CAISO's Updated 2021–2023 Policy Initiatives Roadmap also listed TAC Structure Enhancements as a named roadmap item, demonstrating that CAISO continued to view the TAC billing determinant questions as a relevant and unresolved market policy design topic during this period, rather than as an issue that had been resolved on the merits.

Following this period, TAC Structure Enhancements was included in the 2022<sup>[3]</sup> and 2023<sup>[4]</sup> Policy Initiatives Catalogs, but was moved to Section 7: Discretionary Initiatives, under Section 7.1: Energy and Ancillary Services Markets. In these catalogs, CAISO continued to describe the initiative's technical scope, whether the volumetric TAC structure should be retained or modified to include peak demand, and whether the billing determinant for internal load should be adjusted to account for load offset by distributed energy resources, and reiterated that the draft final proposal was complete and on hold pending policy development of the Extend Day-Ahead Markets to EIM Entities initiative.

Consistent with this designation, the TAC Structure Enhancements Initiative was not included in the Final 2022–2024 Policy Initiatives Roadmap, reflecting CAISO's continued deferral of TAC structural changes while EDAM-related policy development was underway. Importantly, exclusion from the Roadmap did not reflect a substantive rejection of the Draft Final Proposal or a determination that the underlying cost causation issues had been resolved.

CAISO subsequently implemented a new submission-based process for the 2024 Annual Policy Initiatives Catalog and Roadmap, under which stakeholders were required to submit new or renewed proposals for CAISO consideration. The TAC Structure Enhancements Initiative was not submitted during that cycle and therefore did not appear in the 2024 Catalog. No technical reassessment of the Draft Final Proposal or its underlying cost causation analysis was conducted.

In 2025, CDWR-SWP submitted a proposal to revisit and restart the TAC Structure Enhancements Initiative, citing the continued relevance of the technical issues evaluated in the 2016–2018 process, including misalignment between volumetric charges and coincident peak demand and the increasing importance of load flexibility, demand response, and efficient use of existing transmission infrastructure. CAISO did not include the initiative in the 2025 Policy Initiatives Catalog<sup>[5]</sup> and instead routed it to the 2025–2026 Transmission Planning Process (TPP) as an infrastructure-related item. At the September 25, 2025, TPP stakeholder meeting, CAISO dismissed the proposal, stating that the issue had been considered in 2018, placed on hold to enable EDAM development, and that changes to the TAC structure were no longer necessary because behind-the-meter solar generation had stabilized. This dismissal did not include a technical reassessment of the Draft Final Proposal, nor did it address the initiative's original focus on coincident peak demand, rate design, or cost allocation principles.

In December 2025, Joint Commenters representing CDWR-SWP, Bay Area Municipal Transmission Group (BAMx), and the State Water Contractors (SWC) submitted a joint letter to the CAISO Board of Governors and the WEM Governing Body requesting directions to CAISO staff to revive the TAC Structure Enhancements initiative through a transparent stakeholder process<sup>[6]</sup>. The Joint Commenters emphasized that the initiative had already undergone extensive technical analysis and stakeholder vetting during the 2016–2018 period, resulting in a Draft Final Proposal that was never presented for Board consideration, and that subsequent procedural deferrals did not constitute a substantive evaluation of whether the existing volumetric TAC remains aligned with transmission cost causation, coincident peak demand, or evolving system usage. In addition, CDWR-SWP and

other Joint Commenters submitted detailed comments on the 2026-2028 Annual Policy Initiatives Roadmap<sup>[7]</sup>, explaining that TAC Structure Enhancements raises fundamentally market policy questions related to rate design and cost allocation, rather than infrastructure planning issues, and therefore falls squarely within the scope of the Market Policy Catalog and Roadmap process. The Joint Commenters requested that CAISO initiate a dedicated stakeholder process to reassess the Draft Final Proposal in light of current system conditions, rather than relying on continued deferral or summary dismissal, to ensure that transmission cost recovery remains aligned with cost causation, market efficiency, and California’s evolving clean energy and load flexibility objectives.

While TAC-related items were noted as appropriate for the Infrastructure Policy process during the January 26, 2026, kick-off meeting, TAC Structure Enhancements fall into a gray area. The initiative is fundamentally about rate design and cost allocation, which are core market policy elements. For this reason, CDWR-SWP believes it is important to submit this proposal through both the Market Policy Catalog and Roadmap and Infrastructure Policy Catalog and Roadmap processes to ensure these considerations receive proper attention.

[1] “Modifications to TAC Structure: Hybrid Billing Determinant Proposal.” Transmission Access Charge Structure Enhancements Draft Final Proposal, September 2018, pp. 9-18, Section 7, <https://stakeholdercenter.caiso.com/InitiativeDocuments/DraftFinalProposal-TransmissionAccessChargeStructureEnhancements.pdf>

[2] CAISO, 2020 Final Policy Initiatives Catalog, “Section 5: Initiatives Currently Underway and Planned – Transmission Access Charge Structure Enhancements.” pp. 14, <https://www.caiso.com/documents/2020finalpolicyinitiativescatalog.pdf>

[3] CAISO, 2022 Revised Policy Initiatives Catalog, “Section 7.1.15: Discretionary Items - Transmission Access Charge Structure Enhancements.” pp. 18, <https://stakeholdercenter.caiso.com/InitiativeDocuments/2022RevisedDraftPolicyInitiativesCatalog.pdf>

[4] CAISO, 2023 Final Policy Initiatives Catalog, “Section 6.1.14: Discretionary Items - Transmission Access Charge Structure Enhancements.” pp. 26, <https://stakeholdercenter.caiso.com/InitiativeDocuments/Final2023PolicyInitiativesCatalog.pdf>

[5] CAISO, 2025 Annual Policy Initiatives Catalog, “Appendix B: Non-Catalog Items.” <https://stakeholdercenter.caiso.com/InitiativeDocuments/Appendix-B-Non-Catalog-Items.xlsx>

[6] Joint ISO Board of Governors and WEM Governing Body General Session, “Joint Public Comment Letter - Briefing on Policy Roadmap.” <https://www.caiso.com/documents/joint-public-comment-letter-briefing-on-policy-roadmap-dec-2025.pdf>

[7] CAISO, 2026-2028 Annual Policy Initiatives Roadmap, “Joint Commenters: Submitted on behalf of

California Department of Water Resources – State Water Project (CDWR), Bay Area Municipal Transmission Group (BAMx), and State Water Contractors (SWC).” <https://stakeholdercenter.caiso.com/Comments/AllComments/efa23f79-fc99-4e24-ac86-eded29e74d06#org-338b2919-b344-43ed-a584-6cfe8f3c24d3>

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

CDWR-SWP believes that TAC Structure Enhancements will address certain areas of market inefficiencies related to transmission usage and cost allocation, as previously identified by CAISO in the Draft Final Proposal for the 2018 TAC Structure Enhancements.

CAISO noted two fundamental issues: (1) how to measure transmission usage, and (2) where to measure it. Since 2001, CAISO has used a volumetric-only approach to allocating TAC costs. However, changes in California's resource mix, load patterns, and the overall evolution of the electric system have reduced the effectiveness of this methodology in reflecting cost causation, system utilization, and the benefits of the transmission system.

CAISO concluded that a hybrid approach, combining both coincident peak-demand and volumetric measurements, better captures the transmission system's dual functions, energy delivery and capacity/reliability—while aligning cost allocation with the benefits users receive. The initiative therefore addresses the policy question of whether the current volumetric-only TAC methodology remains appropriate or should be enhanced to a hybrid framework that more accurately reflects usage, system benefits, and investment drivers.

CAISO determined that the existing volumetric-only Transmission Access Charge may no longer accurately reflect transmission cost causation or system utilization given significant changes in California's resource mix, load patterns, and overall grid operations. CAISO therefore identified the need to reexamine both how transmission usage is measured and how transmission costs are allocated among users.

Based on this assessment, CAISO concluded that a hybrid TAC structure combining volumetric and coincident peak demand components would better align transmission cost recovery with the system's energy delivery, capacity, and reliability functions. CAISO found that retaining a volumetric component continues to reflect energy-delivery benefits, while adding a peak-demand component better captures cost drivers associated with system peak conditions and reliability needs. Compared to a volumetric-only approach, a hybrid framework more accurately reflects transmission usage, cost drivers, and the benefits users receive from the transmission system.

#### **4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The scope of the TAC Structure Enhancement initiative addresses several elements of the existing TAC assessments, as CAISO noted in the Draft Final Proposal for the 2018 TAC Structure Enhancements.

Through this initiative, CAISO would evaluate whether the existing transmission access charge billing determinant should be modified to reflect better customer utilization of, and benefits derived from the transmission system, including how load offset by distributed generation is treated. The initiative would also assess whether the current volumetric-only TAC structure accurately reflects the causation of transmission costs and customer benefits by examining alternative approaches, including demand-based, time-differentiated, volumetric, or hybrid billing structures.

#### **5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

CDWR-SWP believes that a Hybrid TAC with charges for both Volumetric and Peak Demand would impact infrastructure development and system reliability as follows:

1. Utilities would increasingly move load away from Peak Demand to reduce transmission costs.
2. Lowering Peak Demand would reduce the need for new transmission infrastructure development to accommodate increasing load forecasts.

System Reliability would increase as less Peak Demand reduces the physical strain on current transmission lines, leading to decreased maintenance and replacement costs.

## **6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

If the TAC Structure Enhancement initiative is not addressed in a timely manner, it could have direct economic implications for ratepayers and load-serving entities. Entities with flexible load profiles, in particular, may benefit from a Hybrid TAC structure that better reflects actual system usage and peak cost drivers. Delays in reform could therefore perpetuate cost allocation outcomes that do not fully align with evolving system conditions or policy direction.

## **7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

In the Draft Final Proposal for the TAC Structure Enhancements Initiative 2018, the CAISO provided background on prior and current transmission costs and forecasted different Hybrid TAC balances for estimated future costs through 2022<sup>[1]</sup>. The Draft Final Proposal is the latest, most thorough, and richest public data set and analysis that exists at this point focusing only on the CAISO Market. The review in the Proposal focuses on improving cost allocation to better reflect both energy delivery and reliability functions of the transmission system. The current volumetric-only approach is being evaluated against a hybrid billing determinant that combines volumetric (MWh) and peak demand (MW) measurements. To respond to question 7, CDWR-SWP has outlined the key design elements, analysis, and data sources from the Proposal:

Key design elements include:

- Splitting the High Voltage Transmission Revenue Requirement (HV-TRR) using a system-wide annual gross load factor.
- Using 12-month coincident peak (12CP) measurements for the demand component.
- Maintaining the point of measurement at the end-use customer meter.

The review uses multiple datasets and analytical methods to validate the hybrid approach:

- Data Sources:
  - Historical hourly load data (2014–2017) and monthly coincident peaks for 12CP calculations.
    - Filed annual HV-TRR values (e.g., \$2.165 billion for 2017) and PTO-specific gross load forecasts.
- Analysis Performed:
  - Load Factor Calculation: Determines the split between volumetric and demand charges based on average vs. peak load.
  - Sensitivity Testing: Compares bifurcation ratios (40/60 to 60/40) and peak measurement frequencies (1CP, 4CP, 12CP).

- Historical Variability: Confirms low volatility (<3.5% variance) in annualized 12CP demand, supporting a one-year historic period without weather normalization.

The following figures give one example of the coincident peak measurement frequency scenario for a hybrid TRR split that is equally 50% volumetric and 50% peak demand. It looks at 11 utility areas in the CAISO BAA and for 2018 - 2022 forecasts their gross hybrid TAC payment amounts, the gross amount difference between those hybrid payments and the current TAC payments along with the percentage differences between them.

**Coincident Peak measurement frequency scenarios**

**Scenario: 12CP frequency (12 demand measurements, Hybrid TRR split: 50% Volumetric - 50% Peak Demand)**

**Proposed TAC Charge for Hybrid - Gross Load (\$ million)**

|  | 2018              | 2019              | 2020              | 2021              | 2022              |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|
| PG&E   | \$979.9           | \$1,031.7         | \$1,109.8         | \$1,187.5         | \$1,261.5         |
| SCE  | \$1,032.2         | \$1,086.8         | \$1,169.0         | \$1,250.9         | \$1,328.9         |
| SDG&E  | \$233.7           | \$246.1           | \$264.7           | \$283.3           | \$300.9           |
| Anaheim  | \$28.0            | \$29.5            | \$31.7            | \$33.9            | \$36.0            |
| Azusa  | \$3.0             | \$3.2             | \$3.4             | \$3.7             | \$3.9             |
| Banning  | \$1.6             | \$1.7             | \$1.9             | \$2.0             | \$2.1             |
| Pasadena   | \$12.6            | \$13.3            | \$14.3            | \$15.3            | \$16.2            |
| Riverside  | \$25.9            | \$27.3            | \$29.3            | \$31.4            | \$33.3            |
| Vernon   | \$13.1            | \$13.8            | \$14.9            | \$15.9            | \$16.9            |
| Colton   | \$4.1             | \$4.3             | \$4.7             | \$5.0             | \$5.3             |
| VEA  | \$4.9             | \$5.1             | \$5.5             | \$5.9             | \$6.3             |
| <b>CAISO Total</b>                                     | <b>\$2,339</b>    | <b>\$2,463</b>    | <b>\$2,649</b>    | <b>\$2,835</b>    | <b>\$3,011</b>    |
| <b>Volumetric - Gross Load (\$/MWh)</b>                | <b>\$5.56</b>     | <b>\$5.82</b>     | <b>\$6.21</b>     | <b>\$6.63</b>     | <b>\$6.97</b>     |
| <b>Coincident Peak 12 Periods - Gross Load (\$/MW)</b> | <b>\$3,071.53</b> | <b>\$3,215.25</b> | <b>\$3,432.31</b> | <b>\$3,663.12</b> | <b>\$3,854.27</b> |

**Figure 1: Proposed TAC Charges for California Utilities using Hybrid TRR Split  
50% Volumetric – 50% Peak Demand[2]**

## Difference between Proposed TAC Charge and Existing TAC Charge (\$)

|             | 2018         | 2019         | 2020         | 2021         | 2022         |
|-------------|--------------|--------------|--------------|--------------|--------------|
| PG&E        | (29,779,795) | (31,356,864) | (33,727,689) | (36,091,342) | (38,340,631) |
| SCE         | 15,509,378   | 16,330,718   | 17,565,448   | 18,796,444   | 19,967,878   |
| SDG&E       | 12,949,226   | 13,634,986   | 14,665,898   | 15,693,692   | 16,671,756   |
| Anaheim     | 760,691      | 800,976      | 861,536      | 921,913      | 979,368      |
| Azusa       | 92,978       | 97,902       | 105,304      | 112,684      | 119,707      |
| Banning     | (1,605)      | (1,690)      | (1,817)      | (1,945)      | (2,066)      |
| Pasadena    | 204,341      | 215,162      | 231,430      | 247,649      | 263,083      |
| Riverside   | 344,029      | 362,248      | 389,637      | 416,943      | 442,928      |
| Vernon      | 311,066      | 327,539      | 352,304      | 376,993      | 400,488      |
| Colton      | 57,590       | 60,640       | 65,224       | 69,795       | 74,145       |
| VEA         | (447,898)    | (471,618)    | (507,276)    | (542,826)    | (576,656)    |
| CAISO Total | 0            | 0            | 0            | 0            | 0            |

## Difference between Proposed TAC Charge and Existing TAC Charge (%)

|           | 2018     | 2019     | 2020     | 2021     | 2022     |
|-----------|----------|----------|----------|----------|----------|
| PG&E      | -2.9496% | -2.9496% | -2.9496% | -2.9496% | -2.9496% |
| SCE       | 1.5255%  | 1.5255%  | 1.5255%  | 1.5255%  | 1.5255%  |
| SDG&E     | 5.8654%  | 5.8654%  | 5.8654%  | 5.8654%  | 5.8654%  |
| Anaheim   | 2.7957%  | 2.7957%  | 2.7957%  | 2.7957%  | 2.7957%  |
| Azusa     | 3.1805%  | 3.1805%  | 3.1805%  | 3.1805%  | 3.1805%  |
| Banning   | -0.0972% | -0.0972% | -0.0972% | -0.0972% | -0.0972% |
| Pasadena  | 1.6465%  | 1.6465%  | 1.6465%  | 1.6465%  | 1.6465%  |
| Riverside | 1.3468%  | 1.3468%  | 1.3468%  | 1.3468%  | 1.3468%  |
| Vernon    | 2.4234%  | 2.4234%  | 2.4234%  | 2.4234%  | 2.4234%  |
| Colton    | 1.4216%  | 1.4216%  | 1.4216%  | 1.4216%  | 1.4216%  |
| VEA       | -8.4204% | -8.4204% | -8.4204% | -8.4204% | -8.4204% |

**Figure 2: Differences for California Utilities between Proposed Hybrid TAC and Existing TAC in Dollars (top) and Percentages (bottom)[3]**

Furthermore, it is important to review the implementation of a hybrid TAC in other markets by reviewing the rollouts, refinements, and impacts/benefits of the implementation. In the Issue Paper for Review Transmission Access Charge Structure Enhancements Initiative from 2017, the CAISO summarizes different approaches to transmission charges for the Independent System Operators (ISOs) and Regional Transmission Owners (RTOs) in the United States: CAISO, NYISO, MISO Multi Value Projects (MVPs), SPP Network Integration Transmission Service (NITS), ISO-NE NITS, MISO NITS, ERCOT (4 summer months), and PJM NITS[4].

Looking into how other markets have implemented hybrid TAC, seeing the impacts of changing their TACs, and updating the TAC data at this time shows a longer history of their implementation and would be informative for stakeholders and beneficial for further discussions. To respond to question 7, CDWR-SWP has outlined the key design elements and summary of other markets rates from the Paper:

Key design elements include:

- A very high-level overview of how transmission charges are structured in other ISOs and RTOs for network transmission service so that it is intelligible and useful for the scope of this initiative.

The review uses no datasets or analytical methods. CAISO says:

- “Providing a comprehensive discussion of every detail of their rate designs would span hundreds of pages.”
- “Different ISOs/RTOs may provide different market services (e.g., network integration service, firm point-to-point service, non-firm service), so a direct apples-to-apples comparison with the CAISO is challenging.”
- “These challenges are compounded by highly varying terms and definitions used in the various RTOs.”

The Figure 3. Summary of ISO/RTO approaches to transmission charges has a breakdown to compare the Volumetric ISO/RTOs and the Demand ISO/RTOs:

- The basis of the charge.
  - Either a Volumetric charge of MWh/Gross Load, or a Demand Charge which is divided into Monthly peak, Annual peak, or Variable.
- Examples of the ISO/RTOs that use each type of basis.
  - Network Integration Transmission Service (NITS) allows an electric transmission customer to integrate, plan, economically dispatch and regulate its network reserves in a manner comparable to that in which the Transmission Owner serves Native Load customers.
  - Multi Value Projects (MVPs) are regional transmission projects designed to support public policy, provide economic value, or provide economic value and reliability.
- The Intent of the charges.
  - Correlation with either beneficiaries for Volumetric charge or cost causation for demand charge
- The Pros of using the different types of charges.
- The Cons of using the different types of charges.

The Figure 3. Summary of ISO/RTO approaches to transmission charges separates the ISO/RTOs based on whether they use a Volumetric charge of MWh/Gross Load, or a Demand Charge which is divided into Monthly peak, Annual peak, or Variable.

**Table 2. Summary of ISO/RTO approaches to transmission charges**

|          | Volumetric  |  | Demand                  |          |
|----------|---|--|-------------------------|----------|
|          | MWh/Gross Load  | Monthly peak   | Annual peak             | Variable |
| Basis    |   |  |                         |          |
| Examples | CAISO<br>NYISO<br>MISO MVPs   | SPP NITS <sup>37</sup><br>ISO-NE NITS<br>MISO NITS   | ERCOT (4 summer months) | PJM NITS |
| Intent   | Correlates with beneficiaries <i>ex post</i> . Customers benefit from transmission as they use it.  | Correlates with cost causation <i>ex ante</i> : Transmission costs were incurred to provide customers reliable service during peak demand periods.                                 |                         |          |
| Pros     | <ul style="list-style-type: none"> <li>- Mirrors energy-based (not capacity-based) market</li> <li>- Easily understandable</li> <li>- Reflects benefits all year</li> <li>- Correlates with RPS-driven construction benefits (e.g., carbon reduction, production cost savings)</li> </ul> | <ul style="list-style-type: none"> <li>- Customers only pay in relation to their contribution to peak conditions (no more, no less)</li> <li>- Historically more common</li> </ul> |                         |          |
| Cons     | Socializes costs incurred due to peak times and/or areas  | <ul style="list-style-type: none"> <li>- More complex than volumetric</li> <li>- Ignores benefits unrelated to peaks</li> </ul>  |                         |          |

**Figure 3: Summary of ISO/RTO Approaches to Transmission Charges<sup>[5]</sup>**

[1] “Appendix B – Hybrid billing determinant proposal TAC cost impact modeling analysis with additional sensitivities.” Transmission Access Charge Structure Enhancements Draft Final Proposal, September 2018, pp. 51, <https://stakeholdercenter.caiso.com/InitiativeDocuments/DraftFinalProposal-TransmissionAccessChargeStructureEnhancements.pdf>

[2] “Coincident Peak measurement frequency scenarios Scenario: 12CP frequency (12 demand measurements, Hybrid TRR split: 50% Volumetric - 50% Peak Demand) Proposed TAC Charge for Hybrid - Gross Load (\$ million).” Transmission Access Charge Structure Enhancements Draft Final Proposal, September 2018, pp. 52, Appendix B, <https://stakeholdercenter.caiso.com/InitiativeDocuments/DraftFinalProposal-TransmissionAccessChargeStructureEnhancements.pdf>

[3] “Coincident Peak measurement frequency scenarios Scenario: 12CP frequency (12 demand measurements, Hybrid TRR split: 50% Volumetric - 50% Peak Demand) Difference between Proposed TAC Charge and Existing TAC Charge (\$).” Transmission Access Charge Structure Enhancements Draft Final Proposal, September 2018, pp. 53, Appendix B, <https://stakeholdercenter.caiso.com/InitiativeDocuments/DraftFinalProposal-TransmissionAccessChargeStructureEnhancements.pdf>

[4] “Section 4: Structure of transmission cost recovery in other ISOs/RTOs.” Review Transmission Access Charge Structure Enhancements Issue Paper, June 2017, pp. 12–18,

<https://stakeholdercenter.caiso.com/InitiativeDocuments/IssuePaper-ReviewTransmissionAccessChargeStructure.pdf>

[5] “Table 2. Summary of ISO/RTO approaches to transmission charges.” Review Transmission Access Charge Structure Enhancements Issue Paper, June 2017, pp. 18, Section 4, <https://stakeholdercenter.caiso.com/InitiativeDocuments/IssuePaper-ReviewTransmissionAccessChargeStructure.pdf>

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

#### **Attachments**

- [26.03.02 Infrastructure Policy Submission CDWR-SWP Final.docx](#)

## **EDF Renewables**

Submitted on 03/02/2026, 05:34 pm

#### **Contact**

Eusebio Arballo (eusebio.arballo@edf-re.com)

### **1. Submission title**

Comprehensive Alignment of Interconnection and TPD Processes with Order No. 1920 Staggered Planning Cycles and Mitigation of Cyclical Inequities

### **2. Has this issue previously been submitted? If yes, please provide a reference.**

No

### **3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

CAISO's Order No. 1920 compliance filing establishes a new planning cadence: a Comprehensive Transmission Plan every two years and a Long-Term Regional Transmission Plan every four years. However, the Generator Interconnection Procedures (GIP) and the Transmission Plan Deliverability (TPD) Allocation process have historically functioned on an annual or "snapshot" basis. This misalignment creates three primary structural and equity issues:

- Structural Planning Gaps: Annual Interconnection Cluster Studies may rely on stale transmission base cases during the off-years of the 2-year Comprehensive TPP cycle.

Furthermore, there is no current link between the 20-year Long-Term Plan and near-term Cluster requirements, leading to the potential over-studying of upgrades that may eventually be superseded by regional infrastructure.

- **Cyclical Inequity in TPD Allocation:** Under the new cadence, even-numbered years will produce comprehensive economic, policy, and reliability results, while odd-numbered years (Interim Assessments) will likely focus solely on reliability. This creates a fundamental bias. Projects seeking TPD in even-numbered years will have a significantly higher likelihood of success compared to those seeking it in odd-numbered years.
- **Queue Intake Volatility:** Because Queue Intake prioritization (via IPE 2023 Track 2) is directly influenced by available and planned transmission capacity, a biennial release of policy-driven capacity will create artificial boom and bust cycles in the cluster windows.

#### **4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The proposed initiative would conduct a comprehensive audit/review and potential revisions to the GIP (RIS) and TPD allocation rules to ensure they are *Order 1920 ready*. Key elements include:

- **Cycle Synchronization:** Aligning the Cluster Study window and cluster studies timelines with the biennial (2-year) Comprehensive TPP to ensure interconnection customers are studied against the most recent, board-approved transmission expansion.
- **TPD Allocation Smoothing & Interim Rules:** Establishing Interim Year allocation procedures to allow for the release of deliverability that becomes available between planning peaks. This includes a smoothing mechanism to distribute newly approved policy deliverability across a full two-year cycle to prevent calendar-based bias.
- **Long-Term Plan Tiering:** Developing a new tier of Conditional Deliverability specifically for resources in the 20-year Long-Term Plan corridors, preventing long-lead resources from being penalized by near-term milestone requirements.
- **Queue Intake Smoothing:** Revising queue intake scoring so that clusters opening in interim years are not penalized for the lack of freshly approved policy transmission, ensuring a steady, predictable pipeline of interconnection requests.

#### **5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

Failure to align these processes may lead to *Planning Whiplash*, where interconnection customers receive study results that are invalidated 12 months later by a new Long-Term Regional Plan. Correcting this misalignment will:

- **Reduce Interconnection Costs:** By preventing the study and assignment of redundant network upgrades that are already being addressed by larger-scale 20-year regional projects.
- **Improve Commercial Certainty:** Ensuring that the deliverability developers see in the TPP is actually available for award in the TPD process without a multi-year lag.
- **Maintain Reliability:** Ensuring that the Interim Reliability Assessments in off-years are sufficiently robust to authorize immediate-need upgrades without waiting for the full 2-year cycle.

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

CAISO's compliance filing targets 2030 for the first synchronized cycle. However, the policy framework (the "Roadmap") must be established during the Roadmap's horizon of 2027 to 2029. If this is not addressed in the 2026 Roadmap, CAISO risks entering the 2030 cycle with an interconnection process that is functionally incompatible with its new transmission planning process, possibly resulting in significant stakeholder disputes regarding fairness and deliverability access when the first interim year occurs.

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

- Existing Data: CAISO 20-year Outlook (2022 & 2024), historical TPD allocation success rates, current Cluster Study timelines, and the Queue Intake scoring data from Cluster 16 (leading into the 2027 initiative timeframe).
- Missing Data: A gap analysis of how an off-year Cluster Study (Year 2 of a TPP cycle) would differ in results if it used a draft TPP base case versus a final one, quantitative modeling of TPD availability in reliability-only odd years vs. comprehensive even years, LSE feedback on how biennial TPD allocations will align with annual RA procurement obligations, and a mapping of how many current queue positions fall within the "Long-Term Regional" zones identified in the Dec 2025 filing.

**8. Submission title**

N/A

**9. Has this issue previously been submitted? If yes, please provide a reference.**

N/A

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

N/A

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

N/A

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

N/A

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

N/A

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

N/A

**15. Submission title**

N/A

**16. Has this issue previously been submitted? If yes, please provide a reference.**

N/A

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

N/A

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

N/A

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

N/A

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

N/A

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

N/A

**Attachments**

- [StakeholderCommentTemplate-2026InfrastructurePolicy\(EDFps\).docx](#)

## **GreenGen Storage**

Submitted on 03/01/2026, 09:45 am

**Contact**

Nicholas Sher (nicholas@greengenstorage.com)

**1. Submission title**

Long Duration Energy Storage (“LDES”) as a Transmission Asset.

**2. Has this issue previously been submitted? If yes, please provide a reference.**

Yes, CESA (not GreenGen) has previously submitted this issue in 2024 and 2025.

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

CAISO currently lacks a clear and prioritized mechanism to allow long-duration energy storage resources selected in the Transmission Planning Process as reliability solutions to recover costs through the Transmission Access Charge (TAC), even when those resources function operationally as transmission facilities. Long-duration storage, particularly flexible pumped storage hydro facilities, can resolve thermal overloads, manage contingencies, and support voltage in a manner comparable to conventional wires upgrades. While FERC has clarified that storage resources may receive cost-based recovery when providing transmission or grid support services (*Docket PL17-2-000, Storage as a Transmission Asset, 2017-01-19*), CAISO’s current planning framework does not provide a practical pathway for doing so. This creates a structural bias toward traditional transmission upgrades and limits the ability of planning studies to select cost-effective non-wires alternatives.

**4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The proposed initiative would be limited in scope and focused on establishing a clear pathway for LDES resources to be evaluated, selected, and compensated as transmission assets when identified in the Transmission Planning Process as reliability solutions.

Specifically, GreenGen recommends the initiative address the following elements:

1. **Transmission Planning Process (TPP) Framework**

Clarify how LDES may be evaluated alongside traditional wires solutions as a transmission reliability alternative, including criteria for determining when a storage resource functionally qualifies as a transmission facility (e.g., thermal overload mitigation, voltage support, contingency relief).

2. **Transmission Access Charge (TAC) Cost Recovery Mechanism**

Develop a defined tariff pathway allowing storage selected through the TPP to recover costs through the TAC when operated to provide transmission services, consistent with FERC policy guidance regarding cost-based recovery for transmission and grid support services (*Docket PL17-2-000, Storage as a Transmission Asset, 2017-01-19*).

3. **Operational Control and ISO Independence Safeguards**

Establish operational parameters consistent with FERC precedent to ensure CAISO independence is preserved, transmission reliability service receives priority dispatch, and any charging or state-of-charge requirements are structured to avoid double recovery concerns, i.e. both on the charging and discharging side of the LDES resource.

4. **Separation of Transmission and Market Functions (Phase II Consideration)**

While concurrent market participation, is an important long-term policy question (as the CAISO explored in its 2018 SATA policy initiative), the scope of this initial initiative should be limited to transmission asset classification and cost recovery. Market participation rules could be addressed in a subsequent phase to allow for stakeholder development of appropriate revenue crediting and competitive safeguards.

Importantly, this initiative avoids modifying core energy market design, resource adequacy accreditation rules, or congestion revenue allocation mechanisms. Rather, it would clarify how long-duration storage resources that are selected to meet defined transmission reliability needs may be treated comparably to other transmission assets under existing planning and cost-recovery structures.

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

Prioritizing a new policy initiative to enable a transmission-asset pathway for long-duration energy storage should have positive impacts on both infrastructure development and long-term system reliability.

Providing a clear TAC-based cost recovery pathway for LDES selected through the Transmission Planning Process would materially reduce development uncertainty and financing risk for developers. Long-duration storage projects are capital-intensive and long lead-time resources. Without a defined cost-of-service pathway when selected to meet transmission reliability needs, these projects face greater commercial risk relative to conventional wires upgrades.

Establishing a transmission classification pathway would expand the set of viable non-wires alternatives in TPP studies, allowing CAISO to select the most cost-effective reliability solution rather than defaulting to traditional transmission infrastructure.

LDES resources are uniquely capable of addressing not only peak-hour overloads but multi-hour and multi-day stress events. As net load volatility increases and renewable penetration rises, reliability challenges are becoming more temporal and less purely locational. Long-duration storage can provide sustained discharge during extended peak events, manage post-contingency overloads, and support voltage in ways that 4-hour storage or static wires upgrades may not fully address. A transmission-asset pathway would allow CAISO planning models to capture these operational reliability benefits more explicitly.

**Finally**, traditional transmission upgrades are long-lived and capital-intensive. In some cases, projected reliability needs may be seasonal, weather-driven, or evolve as load and generation patterns change. LDES can provide a flexible, dispatchable reliability solution that may defer or partially replace certain upgrades while preserving optionality as system conditions evolve.

This flexibility may reduce the risk of overbuilding infrastructure that becomes underutilized as load shapes and resource portfolios change.

## **6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

There is no statutory deadline that GreenGen is aware of requiring immediate implementation of a Storage as a Transmission Asset (SATA) framework. However, there are meaningful time-sensitive infrastructure and reliability considerations that support prioritizing this initiative.

Long-duration energy storage resources such as pumped storage hydro and other larger, long-lead time resources require multi-year development timelines, including permitting, interconnection, financing, and construction. Regulatory uncertainty regarding whether an LDES resource selected in the Transmission Planning Process can recover costs through the Transmission Access Charge materially increases financing risk. Absent policy clarity, projects intended to support post-2030 reliability needs may be delayed or fail to advance.

Because transmission upgrades approved through the TPP are long-lived and capital-intensive, failure to clarify the SATA framework before major infrastructure decisions are made may narrow future flexibility. Addressing this issue proactively preserves optionality and allows CAISO to evaluate non-wires alternatives on an equal footing before committing ratepayer funds on irreversible transmission investments.

## **7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

CAISO already possesses most of the data needed to evaluate Storage as a Transmission Asset framework for long-duration energy storage resources. The Transmission Planning Process models thermal overloads, contingencies, voltage support needs, and congestion patterns, while operational and interconnection studies simulate storage dispatch, duration limits, and state-of-charge constraints. These datasets provide a foundation for assessing when LDES could functionally mitigate defined transmission reliability needs.

The primary gap is not new system data, but analytical refinements. These include comparative modeling of LDES as a non-wires alternative within specific TPP reliability cases, evaluation of duration requirements for sustained overload mitigation, development of operational protocols to ensure transmission-service priority, and assessment of TAC cost-allocation impacts relative to conventional upgrades.

In short, the necessary reliability and planning data largely exist; what is needed is a structured framework to evaluate storage as a transmission alternative within CAISO's existing planning studies.

## **8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## **NextEra Energy Resources**

Submitted on 03/11/2026, 11:37 am

### **Contact**

Jasmie Guan (jasmie.guan@nexteraenergy.com)

### **1. Submission title**

Streamlined Augmentation of Operational Batteries

### **2. Has this issue previously been submitted? If yes, please provide a reference.**

No.

### **3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

NextEra Energy Resources, LLC (“NextEra Energy Resources”), appreciates the opportunity to submit a policy proposal into the 2026 Infrastructure Policy Catalog. NextEra Energy Resources proposes a process change related to “augmentation” of operational battery storage resources that would not subject these actions to the CAISO’s material modification amendment (MMA) process if conditions are met. This change would reduce unnecessary administrative burden for routine maintenance activities while improving grid reliability for CAISO ratepayers by helping ensure that necessary battery augmentations are completed on schedule.

“Augmentation” in this proposal refers to the addition of new power conversion systems (PCS) and new battery containers to an operational project, necessary to maintain the originally-contracted capacity for all lithium ion-based battery storage resources, which experience natural capacity degradation over time. Augmentations are routine maintenance actions that do not increase the power output at the Point of Interconnection (POI). Battery storage operators plan for several (generally at least four) augmentations throughout a typical battery storage project’s contract.

The CAISO’s MMA process currently assesses augmentations using the same process as any other proposed modification, despite the by-definition limited scope of these maintenance actions. NextEra Energy Resources believes this creates an administrative burden for the CAISO and creates potential delays for routine battery storage maintenance. With the increased deployment of contracted battery storage on the CAISO grid, the CAISO is expected to become increasingly burdened with augmentation requests, since each operational battery energy storage resource expects at least four augmentations over the duration of a typical energy storage contract.

NextEra Energy Resources proposes a streamlined notification and approval process allowing battery storage operators to provide 12-month advance notice of planned augmentations to the CAISO, with technical documentation demonstrating compliance with existing interconnection

requirements, thereby enabling timely capacity maintenance without compromising grid reliability or interconnection standards and sustaining dependable capacity for the benefit of CAISO ratepayers.

**4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

NextEra Energy Resources believes the proposed initiative impacts Section 6.5.5.2 of the Business Practice Manual for Generator Management, with the proposed changes allowing for the approval of augmentations via a streamlined process, distinct from the existing MMA process. NextEra Energy Resources does not believe that a corresponding tariff change is required given that an augmentation operation that complies with the proposed requirements would be deemed to not change the electrical characteristic of the resource in such a way as to violate any Applicable Reliability Criteria.

The scope of NextEra Energy Resources' proposal would establish that operational battery storage resources seeking augmentation shall be deemed immaterial by default and not subject to the full MMA process under the circumstance of adding inverters and/or PCS to maintain original capacity, without any increases to the POI injection capacity, if executed within a set of requirements, detailed below.

In order to qualify for the streamlined process, the following conditions must be met:

- The battery storage resource must be operational. Any battery storage resource that is not yet operational will continue to follow the processes laid out in CAISO Tariff Appendix DD or Appendix KK.
- The Interconnection Customer (IC) must provide a 12-month advance notice before the planned augmentation in-service date, with a final 60-day notice of the intended synchronization date or window
- The IC shall provide engineering design documentation that the new inverters will comply with the resource's existing LGIA Appendix H requirements, demonstrate the presence of an existing adequate control scheme to limit power injection to the POI limit, confirm reactive power capability, and provide updated load flow and dynamic models
- The combined incremental short circuit fault current contribution from the new inverters shall be less than 100 Amps per augmentation action at the POI • Documentation of commissioning testing results may be requested by the Participating Transmission Owner, with documentation requested within 90 days of placing the new equipment in service
- The battery storage resource's LGIA shall be updated after the completion of the augmentation action to reflect to the updated configuration

The battery operator will be permitted to proceed upon notification to the CAISO of an upcoming augmentation action and the submittal of the required documentation. NextEra Energy Resources believes this approach will maintain the interconnection standards while establishing a standardized process for battery storage maintenance.

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

This streamlined process recognizes California's accelerated interconnection of battery storage resources onto the grid. Battery storage capacity grew from about 500 MW in 2020 to 13,000 MW in December 2024.<sup>1</sup> Battery storage resources experience capacity degradation due to repeated charge/discharge cycling in addition to steady-state degradation that is independent of cycling. The

resource's output can be maintained by augmentations over the duration of their energy storage contracts. Without a streamlined process, the CAISO's queue management team is expected to receive a continually increasing volume of MMAs to augment battery storage resources, clogging the MMA queue for requests that may have material impacts on the system. The current MMA process creates time and execution barriers to properly maintain battery storage and may cause battery storage to underproduce during real time operations.

<sup>1</sup> CAISO. 2024 Special Report on Battery Storage. May 29, 2025. Available at: <https://www.caiso.com/documents/2024-special-report-on-battery-storage-may-29-2025.pdf>

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

As noted above, the CAISO's battery storage fleet is increasing and maturing. Without a streamlined process, there will be an influx of MMAs that are administrative by nature that may cause delays in proper maintenance of the battery storage resources, potentially reducing the effective battery storage capacity on the grid. Timely augmentation is essential to maintain contracted capacity levels. Without it, battery storage resources may underdeliver, creating resource adequacy gaps as Load Serving Entities' procurement plans assume full contract performance that cannot be achieved with degraded assets. Ensuring that routine augmentations can proceed without unnecessary administrative delay will help preserve dependable capacity on the CAISO grid, support system reliability, and protect ratepayers from the costs and risks associated with unexpected resource adequacy shortfalls.

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

NextEra Energy Resources believes CAISO has all the existing data to help CAISO identify the magnitude of the issue, including:

- Operational battery storage Megawatts (MWs) within CAISO system
- Battery storage MWs within the CAISO interconnection queue and their CODs
- Appendix H requirements
- Manufacturer specifications for inverter/PCS capabilities
- MMA Processing Timeline
- Past MMA submissions related to battery storage augmentation project

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**Pacific Gas & Electric**

Submitted on 03/02/2026, 02:36 pm

## Contact

Igor Grinberg (ixg8@pge.com)

### 1. Submission title

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Independent System Operator's (CAISO) January 27, 2026, presentation regarding the 2026 Infrastructure Policy Catalog and Roadmap Process.

As PG&E previously stated in its February 25, 2026, comments on the CAISO's Large Load Considerations Issue Paper, PG&E urges the CAISO to start an initiative and move forward expeditiously with the development of new service offerings tailored to large, transmission-connected loads and recommends that this effort be a priority for the CAISO in 2026. Timely and predictable processes for serving large loads will be critical to supporting California's economic and policy objectives.

Also, with respect to transmission planning, PG&E notes that the CAISO will most likely be entering the implementation phase in 2026 of the Federal Energy Regulatory Commission's (FERC) Order No. 1920 reforms. PG&E anticipates that 2026 will involve significant stakeholder engagement and procedural development once FERC approves the CAISO's Order No. 1920 compliance filing. Given the scope and importance of these reforms, PG&E recommends that the CAISO establish and maintain a robust, transparent process for diligence and stakeholder review of any necessary changes to the Transmission Planning Process (TPP) Business Practice Manual.

Taken together, these efforts represent a substantial and important body of work for 2026. PG&E therefore recommends that the CAISO refrain from adding new initiatives for 2026 to an already full agenda. Instead, PG&E encourages the CAISO to focus on refining and improving its existing processes, particularly to support the timely interconnection of large loads and to ensure a comprehensive approach to TPP BPM changes necessary to comply with FERC's Order No. 1920.

In addition, the CAISO is concluding its Interconnection Process Enhancements 5.0 initiative, which follows several years of significant reforms to the generator interconnection process. PG&E suggests that the CAISO allow sufficient time to assess how these existing reforms affect the Cluster 16 intake and study process before considering whether additional interconnection reforms are warranted.

### 2. Has this issue previously been submitted? If yes, please provide a reference.

N/A

### 3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.

N/A

### 4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?

N/A

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

N/A

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

N/A

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

N/A

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## **Sonoma Clean Power Organization**

Submitted on 03/02/2026, 03:44 pm

### **Contact**

Amit (aranjan@sonomacleanpower.org)

### **1. Submission title**

Reliability Modernization Initiative: Align Resource Adequacy Program with Evolving Grid Needs

### **2. Has this issue previously been submitted? If yes, please provide a reference.**

Similar concepts have been raised across CAISO forums (deliverability methodology updates, off-peak deliverability, RA modeling/Slice-of-Day), but not as a single, outcome-oriented proposal to recognize the reliability needs of the modern grid, and the ability of deliverable resources, energy storage, and energy-only resources to contribute. This submission seeks to consolidate and advance those discussions into a concrete initiative that can be scoped and scheduled in the CAISO Catalog.

Key touchpoints include:

- CAISO Deliverability Assessment Methodology refinements (HSN/SSN, dispatch, DFAX), which remain predominantly summer-centric for RA accreditation. [Ref: CAISO, *Final Proposal – Generation Deliverability Methodology Review*, Jan. 4, 2024]
- CAISO Off-Peak Deliverability Assessment Methodology identifying curtailment risk but not tied to RA accreditation or winter reliability. [Ref: CAISO, *Off-Peak Deliverability Assessment Methodology*]
- CPUC Slice-of-Day (SOD) RA framework (hourly checks; charging sufficiency) necessitating alignment between RA and deliverability year-round. [Ref: CPUC 2025 RA & Slice-of-Day Guide; CAISO SOD White Paper (Jan 2024)]

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

CAISO's deliverability and RA constructs continue to center on high-system-need summer hours. That paradigm undervalues energy-only (EO) resources that measurably reduce net load or enable dependable battery charging, and it does not adequately reflect reliability needs in non-summer months as California transitions toward a winter peak. Under the CPUC's Slice-of-Day (SOD) framework, LSEs must demonstrate capacity sufficiency in all hours and must show charging sufficiency for storage. Without complementary updates on the CAISO side, EO resources that provide charging energy or support winter and shoulder-season reliability are not appropriately recognized, creating misaligned signals and under-utilized grid capability.

**4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

This initiative would:

- Establish an accreditation bridge between CPUC Slice-of-Day and CAISO deliverability/RA so resources can earn reliability value in hours and seasons where they demonstrably contribute (including winter).
- Convert off-peak curtailment findings into actionable reliability improvements by identifying targeted transmission solutions to relieve off-peak constraints and defining how such mitigations translate into deliverability upgrades or RA recognition.

**5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

- Improves year-round adequacy (including winter) by recognizing contributions of EO resource-diverse portfolios.
- Accelerates near-term reliability by recognizing reliability value for the many energy-only projects in the queue, making them contractable by LSEs
- Strengthens investment signals for wind, geothermal, offshore wind, and EO + storage that complement solar and evening peaks.
- Aligns RA obligations under SOD with CAISO deliverability outcomes, reducing reliability gaps and unnecessary costs.

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

SOD is in effect for 2025 RA compliance and will shape procurement through 2026–2027. Winter risks are increasing as portfolios diversify and load shapes evolve. Initiating this work now before QC16/TPD cycles and forthcoming procurement lock-ins will avoid another tranche of summer-centric outcomes. If not addressed, California will continue to under-recognize resources that can contribute to charging sufficiency and solve winter and shoulder-season needs, miss cost-effective EO + storage opportunities, and over-rely on expensive alternatives.

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

Existing data:

- CAISO deliverability methodology datasets (dispatch assumptions, monitored elements, DFAX, contingency results).
- Off-Peak Deliverability methodology results identifying curtailment hotspots and mitigation sequences.
- CPUC SOD guidance and CAISO RA/SOD interface materials detailing checks and charging sufficiency.

Missing/needed:

- Accreditation mapping between SOD hours and deliverability outcomes (including a winter module).
- Location-specific curtailment-to-capacity conversion factors to quantify RA gained from targeted transmission upgrades or GETs.

**8. Submission title**

Robust and Adaptability Testing in CAISO Transmission Planning

**9. Has this issue previously been submitted? If yes, please provide a reference.**

Elements of robust and adaptability testing appear in CAISO's annual Transmission Planning Process (TPP) and in CPUC base/sensitivity portfolios, but CAISO does not yet have a formal, standardized framework embedded in TPP for evaluating opportunities to improve the robustness and adaptability of transmission upgrades. This submission proposes creating that formal DMUU element.

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

California faces elevated uncertainty: rapid load growth from electrification and data centers, evolving resource mixes (offshore wind, long-lead out-of-state wind), extreme weather, and supply-chain/timing risks. Current practice studies a CPUC base case and limited sensitivities, but lacks a standardized stress-testing and robust planning lens that quantifies risk and supports “right-sizing”

transmission across plausible futures. A formal module is needed so CAISO's TPP can proactively identify robust and adaptable transmission solutions that perform well across uncertainty, reduce regret, and improve readiness for policy transmission beyond the CPUC base portfolio. This approach to transmission planning has been demonstrated by the Midcontinent Independent System Operator (MISO), which included robust testing in development of its 2024 MISO Transmission Expansion Plan (MTEP).

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The initiative introduces a formal module into CAISO's TPP, aligned with the planning principles specified in FERC Orders 1920 and 1920-A. The module would apply standardized stress tests annually to CPUC portfolios, examining conditions such as accelerated load growth from electrification and data centers, delays in offshore wind development, constrained availability of out-of-state resources, extreme-weather conditions, and potential delays in interconnection-driven upgrades. CAISO would publish these stress-test results alongside reliability, policy, and economic studies and identify transmission upgrades that are cost-effective at meeting needs across a range of uncertain futures .

The initiative also establishes a consistent protocol for evaluating right-sizing opportunities and for assessing whether larger-scale, scalable, or staged transmission solutions, including the use of grid-enhancing technologies, provide improved long-term value across scenarios. A policy-proactive track would assess scenario variants beyond the CPUC base portfolio, enabling earlier visibility into policy-driven transmission needs. CAISO would further develop structured menus of transmission and non-transmission options with clear comparative metrics and incorporate robust decision-making criteria that account for downside risk, regret, and option value.

All findings and methodologies would be documented in an annual Technical Appendix. The initiative also proposes a policy-transmission readiness list and corresponding map to identify projects that are not selected in the base-case plan but that demonstrate robustness across stress tests. Activities would be synchronized with the TPP schedule so that stress-test outputs directly inform project selection.

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

Implementing robust and adaptability testing is expected to significantly enhance system reliability and resilience by identifying vulnerabilities associated with uncertain load growth, offshore or out-of-state development delays, and extreme-weather events. Earlier detection of robust or scalable transmission solutions will reduce the likelihood of curtailment, reliability risks, or the need for reactive upgrades later in the decade. The framework will also support more cost-effective planning by identifying opportunities where larger or staged projects reduce long-term system costs or avoid repeated rebuilds. Improved alignment between interconnection-related network upgrades and long-term planning will enhance queue efficiency, reduce delays, and accelerate deliverability for high-value resources.

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

Implement robust and adaptability testing beginning with the current TPP cycle to align with FERC Order 1920/1920-A long-term, scenario-based planning expectations and to address near-term uncertainty from rapid electrification, data-center load, and potential OOS/offshore timing risks. Acting now reduces the chance of under-sizing transmission, stranded upgrades, or RA shortfalls later in the decade.

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

Existing: CAISO study plans and results; CPUC base/sensitivity portfolios and busbar mapping; interconnection upgrade data; benefit metrics required under federal planning rules; public research on probabilistic/robust planning methods.

Needed additions: (1) a standardized stress-test library applied each cycle; (2) a robust-planning evaluation sheet (benefits/regrets across scenarios) published with the Draft Plan; and (3) a policy-Tx readiness list and map so robust projects have a visible on-ramp even when not selected in the base case.

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## **State Water Contractors**

Submitted on 03/02/2026, 11:35 am

## Contact

Jonathan Young (jyoung@swc.org)

### 1. Submission title

Transmission Access Charge (TAC) Structure Enhancements

### 2. Has this issue previously been submitted? If yes, please provide a reference.

Yes. [Most recently, this issue was submitted by CDWR in 2025 in the CAISO Policy Initiatives Process.](#) It was also included in the CAISO Policy Catalog from 2020-2025.

This initiative was first explored by the CAISO from [2015-2018](#) but was put on hold to pursue other initiatives.

### 3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.

The current TAC structure relies solely on volumetric measurements, which fails to capture how the transmission system functions. By incorporating coincident peak-demand alongside volumetric data, a hybrid framework would more accurately reflect the need to deliver energy, ensure greater utilization of transmission capacity and reliability of the grid. This approach would also align cost allocation with the benefits each user receives.

### 4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?

The CAISO previously determined that the existing volumetric-only TAC structure may no longer accurately reflect transmission cost causation or system utilization, citing significant shifts in California's resource mix, load patterns, and overall grid operations. This conclusion prompted CAISO to reexamine both how transmission usage is measured and how transmission costs are allocated among market participants.

The proposed initiative would evaluate whether the current volumetric-only TAC structure continues to accurately capture transmission cost causation and customer benefits. To that end, CAISO could explore alternative billing approaches — including demand-based, time-differentiated, volumetric, and hybrid structures — to determine whether a more reflective cost allocation methodology is warranted.

### 5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.

This initiative would likely improve system reliability by enabling CAISO to develop additional market signals that incentivize load shifting away from peak periods. It would also drive greater utilization of

the existing transmission network, potentially reducing the need for costly future transmission buildout.

As generation and consumption patterns continue to evolve, a hybrid TAC structure would provide the flexibility needed to adapt cost allocation methodologies accordingly — ensuring that both customers and grid reliability benefit as market conditions change.

**6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

There are no regulatory requirements for implementing this initiative, however, CAISO remains an outlier among major ISOs and RTOs in its continued reliance on a volumetric-only transmission access charge methodology. This approach is increasingly at odds with industry norms and fails to create meaningful price signals that would incentivize large energy users to shift load away from peak demand periods. Furthermore, the current structure results in an inequitable cross-subsidization, whereby entities with flexible loads effectively bear a disproportionate share of transmission costs on behalf of those that are unable or unwilling to manage their peak demand exposure.

With the pending creation of a west-wide market, we believe having an equitable structure in place now ensures costs are fairly allocated in the future.

Additionally, Senator Becker has introduced SB 943, which would urge the CAISO to adopt recommendations from the California Public Utilities Commission regarding TAC reforms that would better align with cost causation principles.

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

Much of the data was first analyzed in the 2016-2018 initiative would need to be updated. Data to be analyzed could include but not be limited to analysis of 12-month coincident peak, growth of distributed energy resources, growing electrification, changes in customer class composition, analysis of constrained hours, TAC rates, gross load, grid composition, congested transmission lines, and incorporation of CAISO's recently adopted transmission plans.

CAISO could also analyze how different hybrid structures and implementation timeframes would impact existing customers.

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**18. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**19. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**20. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**21. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

## **The Joint Parties**

Submitted on 03/02/2026, 12:49 pm

**Submitted on behalf of**

(1) ACP – California; (2) the Bay Area Municipal Transmission Group (BAMx), comprised of the City of Palo Alto Utilities and the City of Santa Clara, dba Silicon Valley Power; (3) the California Community Choice Association; (4) the California Municipal Utilities Association; (5) the Six Cities, comprised of the cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside California; (6) Shell Energy North America (US), L.P.; and (7) the Regents of the University of California (UC Regents).

**Contact**

Lauren Carr (lauren@cal-cca.org)

**1. Submission title**

Maximum Import Capability (MIC) Enhancements

**2. Has this issue previously been submitted? If yes, please provide a reference.**

Yes, the California Community Choice Association, Shell Energy North America (US), L.P., and the Six Cities (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California) submitted this issue into the 2024 stakeholder catalog.<sup>[1]</sup> As a result, the CAISO scoped this issue into the Resource Adequacy (RA) Modeling and Program Design (RAMPD) initiative,<sup>[2]</sup> but has yet to address it.

[1] <https://stakeholdercenter.caiso.com/Comments/AllComments/7229828e-d159-4450-b317-4026172a6b55#org-06ad7cfb-56c8-4d6a-a396-a13aa8e57de0>.

[2] <https://stakeholdercenter.caiso.com/InitiativeDocuments/Appendix-B-2024-Final-Dispositions.xlsx>.

**3. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

California Public Utilities Commission (CPUC)-jurisdictional and non-CPUC-jurisdictional load serving entities (LSE) are facing challenges in contracting out-of-state (OOS) resources due to the lack of available MIC and uncertainty around the availability of MIC in the future. The CAISO should address these challenges urgently given the significant role OOS resources are anticipated to play in meeting reliability and clean energy needs.

The CPUC's recently adopted Preferred System Plan (PSP) includes 19 gigawatts (GW) of new OOS wind by 2045.<sup>[1]</sup> <sup>[2]</sup> These OOS resources will require MIC to count towards LSEs' Resource Adequacy (RA) and Integrated Resource Plan (IRP) obligations. Non-CPUC jurisdictional utilities may also be developing resource portfolios that include imported RA resources. Uncertainty regarding whether MIC will be available to support these projects is a significant barrier to LSEs moving forward with Power Purchase Agreements (PPA) for OOS projects. Enhancements in the efficiency of MIC allocations and increasing the availability of MIC should help make import capacity more available to enable meeting RA and IRP requirements.

The Joint Parties have identified several problem statements regarding the MIC calculation and allocation processes that should be addressed in this initiative. These problem statements include, but should not be limited to, the following:

- The long-term MIC process is not conducive to PPAs with future commercial operation dates beyond the immediate year;
- There may be insufficient MIC to meet LSE demand on popular interties; and
- Available MIC may go unused because of either: (1) a cumbersome trading mechanism; (2) parties not making their unused allocations available for trade, and/or (3) parties making unused MIC available at unusable locations.

Other potential questions to explore include: (1) how to balance limited internal and external deliverability; (2) how well does a methodology based on historical import levels support future needs and capabilities; and (3) how should a potential multi-year need be addressed (e.g. multi-year RA)?

[1] Proposed *Decision Requiring 2029-2032 Electric Resource Procurement And Transmitting Portfolios For 2026-2027 Transmission Planning Process*, R.25-06-019 (Feb. 26, 2026) at 56: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M600/K854/600854771.pdf>.

[2] The CAISO's 2026-2027 Transmission Planning Process (TPP) Base portfolio includes 17 gigawatts (GW) of new OOS wind by 2041 as reported in the *CAISO DRAFT Study Plan 2026-2027 Transmission Planning Process* (Feb. 17, 2026) at 45: <https://stakeholdercenter.aiso.com/InitiativeDocuments/2026-2027-Transmission-Planning-Process-Unified-Planning-and-study-Plan-Draft-Feb-2026.pdf>.

#### **4. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

The Joint Parties recommend exploring enhancements to the MIC calculation and allocation methodology to address the problem statements in section 3 above, and any additional, related problem statements that may arise through stakeholder working group discussions. These enhancements should recognize that MIC is fundamentally a transmission deliverability and interface capability issue that affects all CAISO market participants, regardless of regulatory jurisdiction. The CAISO should continue to scope this initiative into the RAMPD initiative, given the many policy implications MIC enhancements initiative has with respect to the RA program.

While the Joint Parties recommend this initiative remain within the scope of the RAMPD initiative, we are submitting this initiative in both the market design policy catalog and the infrastructure policy catalog. The bulk of the issues in this proposal are squarely market design issues in the RA program. However, there may be a subset of issues, such as calculation methodology changes, that fit best within an infrastructure-driven initiative. If so, these issues could be bifurcated as the stakeholder process develops.

#### **5. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

The CPUC has recently identified a 6,000 MW [1] reliability need between 2029-2032 and has ordered CPUC-jurisdictional LSEs to procure new resources to meet this reliability need. [2] In addition to CPUC-identified reliability timelines, non-CPUC-jurisdictional LSEs face immediate contracting timelines that require greater certainty around future MIC availability several years in

advance of commercial operation dates. California has historically depended on contracted import capacity to maintain reliability.<sup>[3]</sup> This trend is likely to continue in the coming years, as demonstrated by the CPUC's recently adopted PSP, described above. Uncertainty regarding whether MIC will be available to support these projects is a barrier to the development of OOS projects that could be needed to support system reliability in the near and long term. Enhancements in the efficiency of MIC allocations and increasing the availability of MIC should help make import capacity more available to meet these reliability needs.

<sup>[1]</sup> The need is denominated in Net Qualifying Capacity and since the resources are likely to come from non-emitting resources, the amount of installed capacity will be significantly greater.

<sup>[2]</sup> *Id.*, at 2.

<sup>[3]</sup> Analysis in the Joint Parties prior catalog submission shows that LSEs are dependent on imports to meet RA requirements, and from 2020-2023, CAISO interconnected resources alone were insufficient to meet RA requirements in total:

<https://stakeholdercenter.caiso.com/Comments/AllComments/7229828e-d159-4450-b317-4026172a6b55#org-06ad7cfb-56c8-4d6a-a396-a13aa8e57de0>.

## **6. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

This issue should be addressed immediately, as it is one of the most urgent issues scoped into the RAMPD initiative. As discussed above, the CPUC has found a reliability need in 2029-2032.<sup>[1]</sup> The ability to obtain the MIC necessary to support imports could make the difference between having enough RA-eligible supply to meet reliability targets and coming up short.

LSEs are contracting to meet IRP requirements, including the recently proposed CPUC procurement order,<sup>[2]</sup> their own IRPs which will be updated this year,<sup>[3]</sup> and the CPUC's PSP, which includes 19 GW of OOS wind by 2045.<sup>[4]</sup> Non-CPUC jurisdictional LSEs are likewise actively engaged in planning and procurement to meet long-term needs. Some OOS projects are currently in the process of contracting to provide capacity to California,<sup>[5]</sup> but the lack of available MIC is hampering those efforts. In addition, transmission projects are under development using Subscriber Participating Transmission Owner (SPTO) Model and a review of MIC policy is necessary to ensure MIC availability is aligned with the in-service date of SPTO projects. The CAISO should urgently begin a MIC Enhancements initiative to ensure reliable delivery of supply now and in the future.

<sup>[1]</sup> Proposed *Decision Requiring 2029-2032 Electric Resource Procurement And Transmitting Portfolios For 2026-2027 Transmission Planning Process*, R.25-06-019 (Feb. 26, 2026) at 2: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M600/K854/600854771.pdf>.

<sup>[2]</sup> *Ibid.*

<sup>[3]</sup> *Administrative Law Judge's Ruling Setting Requirements For Individual Integrated Resource Plans Due June 1, 2026*, R.25-06-019 (Jan. 16, 2026): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M595/K085/595085015.PDF>.

<sup>[4]</sup> Proposed *Decision Requiring 2029-2032 Electric Resource Procurement And Transmitting Portfolios For 2026-2027 Transmission Planning Process*, R.25-06-019 (Feb. 26, 2026) at 56: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M600/K854/600854771.pdf>.

<sup>[5]</sup> Cumulative New Resources included in Non-CPUC Jurisdictional IRP Plan, as reported in *CAISO 2026-2027 Transmission Planning Process –Draft Transmission Plan Stakeholder Meeting*,

February 24, 2026 at 71: <https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-2026-2027-Transmission-Planning-Process-Feb-24-2026.pdf>.

**7. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

The CAISO has the data needed to analyze this issue. OASIS includes monthly MIC rights allocated by intertie and LSE, monthly MIC used in RA showings by intertie and LSE, monthly MIC made available to trade by intertie, and monthly MIC traded by intertie. This information can be used to investigate the severity of the following two main sources of MIC availability challenges: (1) insufficient MIC to meet LSE demand on popular interties; and (2) unused MIC either because of a cumbersome trading mechanism, MIC not being made available, or unusable location. Analysis of this data should be used to prioritize solutions that can address the most pressing issues.

**8. Submission title**

**9. Has this issue previously been submitted? If yes, please provide a reference.**

**10. Issue Description: Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.**

**11. Proposed Initiative Description: Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?**

**12. Impact: To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.**

**13. Timing and Urgency: Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?**

**14. Data: Identify existing data and missing data needed to analyze the issue and develop solutions.**

**15. Submission title**

**16. Has this issue previously been submitted? If yes, please provide a reference.**

**17. Issue Description:** Briefly provide a description of the infrastructure policy issue that the proposed initiative is intended to address.

**18. Proposed Initiative Description:** Discuss the scope of the proposed initiative. What specific elements of existing ISO infrastructure policy does your initiative propose to address?

**19. Impact:** To the extent possible, discuss any anticipated impacts to infrastructure development or system reliability.

**20. Timing and Urgency:** Are there regulatory requirements for implementation dates, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?

**21. Data:** Identify existing data and missing data needed to analyze the issue and develop solutions.

## Appendix B: Stakeholder Prioritization Survey Results



## Comments on Stakeholder Presentations

2026 Infrastructure policy catalog and roadmap process

### Comment period

Apr 13, 2026, 12:30 pm - May 15, 2026, 05:00 pm

### Submitting organizations

ACP-California

AES

Bay Area Municipal Transmission Group (BAMx)

California Community Choice Association

California Department of Water Resources - State Water Project

California Energy Storage Alliance (CESA)

California Public Utilities Commission - Public Advocates Office

Calpine Corporation

CPUC

EDFps

ENGIE NA

MRP

NextEra Energy Resources

Pacific Gas & Electric

Peninsula Clean Energy

Rev Renewables

SCE

Six Cities

State Water Contractors

The California Municipal Utilities Association (CMUA)

Vistra Corp.

### ACP-California

Submitted on 05/14/2026, 07:07 pm

Submitted on behalf of

ACP-California

### Contact

Caitlin Liotiris (ccollins@energystrat.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

ACP-CA's top priorities for the Infrastructure roadmap in 2026 are the EDF Renewables Comprehensive Alignment Post-Order 1920 submission and the NextEra Streamlined Augmentation of Operational Batteries submission.

ACP-CA is a co-submitter of the Joint Parties MIC Enhancements proposal and also made our own presentation on MIC Enhancements at the April 8<sup>th</sup> stakeholder meeting. Addressing MIC Enhancements is a high priority to ACP-California. We understand that CAISO may ultimately pursue this initiative as part of the RA Modeling & Program Design initiative within the Market Policy roadmap, and would support its prioritization in whichever roadmap advances it most directly.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

1. high

ACP-CA strongly supports this submission. Given the projected volume of augmentation MMAs (each currently subject to processing timelines that can exceed 12 months), there may be a significant backlog that reduces the ability of operating BESS assets to meet their full RA obligations. NextEra's proposed notification-plus-technical-data-package framework, with its proposed guardrails (no POI increase, 100 Amp incremental short-circuit current limit, Appendix H compliance verification, and updated load-flow and dynamic models), appropriately balances administrative efficiency against reliability protection. This is a narrow, technically bounded reform that should advance promptly in 2026.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

2. medium

ACP-California supports refining opportunities for Energy Only Resources to seek deliverability and strongly supports including this topic in an upcoming stakeholder initiative. We also understand that CAISO will likely be opening an IPE 6.0 in the coming months and believe this topic may be well situated to be addressed as part of that broader initiative.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

1. high

ACP-CA is a co-submitter of the Joint Parties MIC Enhancements proposal and made our own presentation on the topic during the April stakeholder meeting. The current requirement that an RA contract used to lock in MIC be active in the next RA year is a direct barrier to the long-dated PPAs needed to support both CPUC PSP procurement and non-CPUC LSE long-term planning, and the

combination of insufficient MIC on popular interties and unused MIC elsewhere indicates both methodology and trading mechanism enhancements are warranted.

As noted in our response to Question 1, ACP-CA supports advancing this work in whichever roadmap (Infrastructure or Market Policy) offers the most direct path to resolution.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

4. not a priority

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

3.low

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

3.low

ACP-CA agrees with several of the gaps SCP identifies, including the underutilization of existing grid capability and the opportunity to better recognize value from EO resources.

That said, the initiative as scoped is broader than ACP-CA would support at this time, and likely broader than what a CAISO stakeholder initiative can productively take on. These issues may be better addressed through the CPUC RA proceeding, and we encourage CAISO to consider whether parallel tracks could create timing or coordination challenges.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

2. medium

ACP-CA supports reinitiating policy exploration on storage as a transmission asset (SATA). However, we would advocate for this initiative to include all storage. We would further advocate that storage market participation for SATA resources (also known as "dual-use") should be scoped into this initiative, rather than delayed to a later phase, as it may not be economically feasible to develop a use-limited storage resource to serve SATA functions exclusively, which may only provide revenue based on the value of a few hours per day. We note that dual-use participation was part of the SATA initiative opened in 2018 but suspended in 2019.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

1. high

ACP-CA supports this submission as a high priority for the 2026 infrastructure roadmap and encourages CAISO to expand the initiative scope to include related TPD transparency and process improvements:

Publishing expected TPD by zone and POI from upgrades approved in each TPP

A penalty-free queue withdrawal mechanism when zonal TPD materially changes due to project cancellation or other developments outside the interconnection customer's control

More systematic evaluation of TPD availability by zone to identify chronically congested areas where interconnection requests are triggering disproportionate upgrade costs;

Regular evaluation of whether TPPs are advancing upgrades in major corridors identified in the 20-year outlook as necessary to access important clean energy zones

These gaps in the post-IPE zonal and bus-bar mapping framework have become more pressing following the SDM cancellation and fit naturally within the cadence the EDF proposal anticipates.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

No additional feedback at this time.

## AES

Submitted on 05/16/2026, 06:20 am

### Contact

Rahul Kalaskar (rahul.kalaskar@aes.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

**1. Streamlined Augmentation of Operational Batteries**

**2. Robust Adaptability Testing in CAISO Transmission**

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

AES operates battery energy storage systems in CAISO and supports streamlining the augmentation process for operational batteries. Reducing the timeline and administrative barriers to capacity expansions at existing sites is critical to meeting California's storage deployment goals and improving grid reliability. Simplified processes would enable faster response to market signals and state policy requirements.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

Not a priority

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

Not a priority

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

low

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

Medium - AES supports robust adaptability testing in CAISO transmission planning to address reliability concerns as the grid transitions to higher penetrations of renewable energy. With significant solar and wind resources in our portfolio, ensuring transmission infrastructure can reliably accommodate variable generation profiles is essential. Enhanced testing protocols will improve transmission planning for renewable integration and help identify potential reliability issues before they impact grid operations or market participant assets.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

Medium-AES supports the Reliability Modernization Initiative as traditional reliability frameworks must evolve to reflect the changing resource mix on the grid. With battery storage, solar, and wind assets, AES has a vested interest in ensuring that reliability standards and planning processes appropriately address the operational characteristics of these technologies. Modernizing reliability approaches will improve transmission planning for renewable integration, address emerging reliability concerns, and ensure grid infrastructure supports both existing and future clean energy resources effectively.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

Not a priority

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

Not a priority

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

AES appreciates the opportunity to provide input on the 2026 Infrastructure Policy Catalog. Our priorities reflect the critical needs of the change in resource mix as the state continues to pursue net zero by 2040. First, streamlining battery augmentation processes is essential to expanding operational storage capacity and meeting California's deployment goals. Second, we support initiatives that modernize reliability frameworks and strengthen transmission planning to accommodate the growing penetration of renewable energy and storage resources on the grid. These combined efforts will enhance grid reliability while facilitating the clean energy transition.

## **Bay Area Municipal Transmission Group (BAMx)**

Submitted on 05/15/2026, 12:11 pm

**Submitted on behalf of**

City of Santa Clara dba Silicon Valley Power and City of Palo Alto Utilities

**Contact**

Paulo Apolinario (papolinario@svpower.com), Lena Perkins (lena.perkins@paloalto.gov)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

BAMx<sup>[1]</sup> thanks the CAISO for the effort spent to develop infrastructure policy priorities for 2026. We respectfully request that the CAISO prioritize the **TAC Structure Enhancements** draft final proposal that the ISO developed with broad stakeholder support during the 2016-2018 TAC Structure Review initiative. Adopting the ISO's proposal from that initiative should not result in significant investment of CAISO or stakeholder resources because the proposal has already been developed with broad support.

The current volumetric-only TAC does not reflect cost causation tied to coincident peak demand. A hybrid TAC incorporating both volumetric and peak-demand components would better align transmission cost recovery with actual system usage and encourage demand flexibility. It would also bring the CAISO into alignment with standard practice at other RTOs and ISOs around the USA: ERCOT<sup>[2]</sup>, ISO-NE<sup>[3]</sup>, MISO<sup>[4]</sup>, NYISO<sup>[5]</sup>, PJM<sup>[6]</sup>, and SPP<sup>[7]</sup> all have demand-based billing determinates as a component of their regional transmission access charges.

<sup>[1]</sup> BAMx consists of the City of Santa Clara dba Silicon Valley Power and City of Palo Alto Utilities

[2] [https://www.ercot.com/mktinfo/data\\_agg/4cp](https://www.ercot.com/mktinfo/data_agg/4cp)

[3] [https://www.iso-ne.com/static-assets/documents/100026/2025\\_06\\_nlcr\\_final.pdf](https://www.iso-ne.com/static-assets/documents/100026/2025_06_nlcr_final.pdf)

[4] [https://docs.misoenergy.org/miso12-legalcontent/Schedule\\_09\\_-\\_Network\\_Integration\\_Transmission\\_Service.pdf](https://docs.misoenergy.org/miso12-legalcontent/Schedule_09_-_Network_Integration_Transmission_Service.pdf)

[5] <https://nyisoviewer.etariff.biz/ViewerDocLibrary/MasterTariffs/9FullTariffNYISOOATT.pdf>

[6] <https://www.pjm.com/markets-and-operations/billing-settlements-and-credit/guide-to-billing>

[7] [https://www.spp.org/documents/75033/participant\\_onboarding\\_guide\\_-\\_transmission\\_settlements.pdf](https://www.spp.org/documents/75033/participant_onboarding_guide_-_transmission_settlements.pdf)

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

3. Low. The CAISO battery fleet is relatively young, with the bulk of capacity added in just the last two years. The proposal identifies a reasonable modification to the Material Modification Assessment (MMA) process for routine augmentations that maintain storage capacity at contracted levels, but the current battery fleet is young enough that augmentations won't begin in earnest for several years. There is ample time to address this proposal in future years before the volume of augmentation MMAs increases substantially.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

2. Medium. Converting existing energy-only resources to deliverable status would expand the capacity available in the RA market and potentially reduce costs for RA procurement without substantial CAISO or stakeholder investment.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

1. High. LSEs in need of RA capacity credit for imports face significant challenges acquiring Maximum Import Capability for imported RA resources. The ability to secure MIC is essential for LSEs to contract for imported resources, making it difficult for LSEs to meet capacity needs and leading to and higher prices for California LSEs. Uncertainty around future MIC availability is a barrier to executing PPAs for out-of-state RA needs.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements**

**submission (CDWR and others)**

1. High. See response to question 1.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

2. Low. Non-wires solutions, such as strategic placement of storage or flexible loads, can alleviate transmission constraints without the need for new transmission investment. Where feasible, the Transmission Planning Process could test the effectiveness of these non-wires solutions as an alternative to transmission investment. BAMx anticipates that such a formal testing framework would be a substantial undertaking for CAISO staff and could potentially be deferred to a year with fewer active policy initiatives.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

2. Low. It is true that the current deliverability and RA accreditation framework are summer-oriented, and CEC demand forecasts for the 2040s show a gradual shift to winter peaking conditions. However, this transition is far in the future and there is ample time to develop RA accreditation frameworks that better-recognize resource contributions during winter and shoulder seasons during years with fewer active policy initiatives.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

3. Low. This proposal fits within the SCP proposal for Robust Adaptability Testing in the CAISO Transmission planning process.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

4. Not a priority. Order 1920 alignment will proceed regardless of the stakeholder prioritization process.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

Not at this time.

**California Community Choice Association**

Submitted on 05/15/2026, 03:46 pm

**Contact**

Shawn-Dai Linderman (shawndai@cal-cca.org)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

The California Community Choice Association (CalCCA) appreciates the opportunity to assist the California Independent System Operator (CAISO) with prioritizing infrastructure-related initiatives for exploration in 2026. CalCCA's highest priorities are: (1) the Energy-Only (EO) to deliverability pathway; and (2) Maximum Import Capability (MIC) enhancements.

**EO to deliverability** - The CAISO should commit to exploring enhancements necessary to make EO resources fully deliverable when upgrades are required, particularly when projects have made commitments with load serving entities (LSE) or when projects are aligned with local regulatory authority policy needs. The California Public Utilities Commission (CPUC) has recently identified a 6,000 megawatt<sup>[1]</sup> reliability need between 2029-2032 and has ordered CPUC-jurisdictional LSEs to procure new resources to meet this reliability need.<sup>[2]</sup> Capacity eligible to satisfy the CPUC's procurement order must be deliverable or paired with a deliverable resource. In addition, Resource Adequacy (RA) capacity has been scarce for the last few years. While recent builds have helped, load growth may account for all the recently built capacity, requiring more RA to be procured.

A viable approach to converting EO resources to deliverable resources could help expand and expedite opportunities for developers to finance and construct projects without a Transmission Plan Deliverability (TPD) allocation. Constructed and operational projects may be more viable than earlier-stage projects under development, may be able to provide deliverable capacity more quickly than earlier stage projects, and should be allowed to compete against other projects in the interconnection intake process and TPD allocation process to contribute to the state's RA requirements.

**Maximum Import Capacity (MIC) Enhancements** - Within the RA Modeling and Program Design (RAMPD) initiative, the CAISO should conduct a comprehensive review of the practices and policies for quantifying, assigning, transferring, and utilizing MIC to support eligibility of import resources to provide RA capacity. The ability to bring new deliverable capacity online is paramount to supporting reliability and clean energy goals. As stated in the Joint Parties' submittal, CPUC- and non-CPUC-jurisdictional LSEs are actively evaluating opportunities to contract with out-of-CAISO resources to support long-term planning efforts, but challenges with obtaining MIC when and where needed create barriers to long-term contracting and RA procurement.

While the Joint Parties<sup>[3]</sup> submitted this initiative in both the Market Design and Infrastructure catalog processes,<sup>[4]</sup> CalCCA strongly urges the CAISO to pursue MIC Enhancements as part of the RAMPD initiative, rather than under a separate infrastructure-related initiative. MIC policy and implementation are inextricably intertwined with RA policy and implementation, and the CAISO balancing authority area (BAA) has historically relied on imports to meet RA requirements. It is critical that consideration of enhancements to MIC determination and application be fully integrated with, informed by, and supportive of RA policy and objectives.

<sup>[1]</sup> The need is denominated in Net Qualifying Capacity and since the resources are likely to come from non-emitting resources, the amount of installed capacity will be significantly greater.

[2] Decision 26-02-057, *Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for 2026-2027 Transmission Planning Process*, Rulemaking 25-06-019 (Feb. 26, 2026), at 2, <https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=601777006>.

[3] The Joint Parties include: (1) ACP – California; (2) the Bay Area Municipal Transmission Group (BAMx), comprised of the City of Palo Alto Utilities and the City of Santa Clara, dba Silicon Valley Power; (3) CalCCA; (4) the California Municipal Utilities Association; (5) the Six Cities, comprised of the cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside California; (6) Shell Energy North America (US), L.P.; and (7) the Regents of the University of California (UC Regents).

[4] See the Joint Parties MIC Submittal (Mar. 2, 2026), <https://stakeholdercenter.caiso.com/Comments/AllComments/488eeaed-a534-4241-bf4a-64959057ab88#org-b4a7376a-d17a-4ff6-823a-22a440b8eedc>.

**2. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

Medium Priority – Streamlining the storage “augmentation” process as proposed by NextEra Energy Resources should be explored to ensure that storage resources can sustain capacity above contractual requirements as battery cells degrade over time.

**3. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

High priority – See response in section 1.

**4. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

High priority – See response in section 1.

**5. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

CalCCA has no comments at this time.

**6. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

High priority - The CAISO, in coordination with the CPUC, should reform its transmission planning tools and decision-making processes to be more robust under uncertain scenarios. System planning

is becoming increasingly challenged by uncertain assumptions, given the emergence of new large loads like data centers, changes in federal policy, and new technology innovation. Proactive development of transmission capacity, and particularly lines that enable a diverse set of resources that satisfy grid needs under a range of scenarios, is the primary opportunity to improve robustness of California's grid planning. The CAISO should therefore reform transmission planning tools and decision-making processes to account for uncertainty using robust optimization methods that result in a portfolio that is successful across a range of scenarios.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

CalCCA has no comments at this time.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

CalCCA does not oppose the exploration of long-duration energy storage (LDES) as a transmission asset. However, if the CAISO takes up this initiative, the CAISO should include market participation issues – including the treatment of market revenues and RA accreditation rules – in the scope of the initial phase of the initiative. While GreenGen suggests these issues could be considered in a later phase, these issues will have critical impacts on the cost-effectiveness and viability of this pathway for LDES resources.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

CalCCA has no comments at this time.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

CalCCA has no additional comments at this time.

## **California Department of Water Resources - State Water Project**

Submitted on 05/08/2026, 10:46 am

**Contact**

Kyle N Grousis-Henderson (kyle.grousis-henderson@water.ca.gov)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your**

**top one or two selections.**

Transmission Access Charge (TAC) Structure Enhancements

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

Level of priority: 1. High

**CDWR Comment:** CDWR-SWP believes that the TAC Structure Enhancements with a hybrid TAC design, as discussed during the April 8, 2026 stakeholder meeting, provides the following benefits for market participants:

It is consistent with cost causation. CAISO's existing TAC structure results in cost shifts among transmission customers

Other ISOs use peak demand contribution to assess transmission charges

Adding a temporal element to the TAC structure would send economic signals encouraging market participants to increasingly move load away from peak demand to reduce their transmission costs. Lowering peak demand would reduce the need for new transmission infrastructure development which would reduce cost to all

System reliability would increase as reduced peak demand reduces the physical strain on current transmission facilities, leading to decreased maintenance and replacement of transmission facilities would reduce costs to all

CAISO allocates its annual Local Capacity Requirement for each TAC area to LSEs based on their coincident peak load

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

CDWR-SWP does not have any additional feedback or suggestions at this time

## **California Energy Storage Alliance (CESA)**

Submitted on 05/15/2026, 01:22 pm

### **Contact**

Donald Tretheway (donald.tretheway@gdsassociates.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Streamlined Augmentation of Operational Batteries submission (NextEra)

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

High

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

Medium

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint**

**Parties)**

Medium

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

Low

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

Medium

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

Medium

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

Medium

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

Medium

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

No additional comments

**California Public Utilities Commission - Public Advocates Office**

Submitted on 05/15/2026, 03:37 pm

**Contact**

Patrick Cunningham (patrick.cunningham@cpuc.ca.gov)

Karl Dunkle Werner (karl.dunklewerner@cpuc.ca.gov)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) appreciates the opportunity to comment on new infrastructure-related proposed initiatives.

Cal Advocates does not recommend any particular initiative be prioritized above another at the Infrastructure Policy Catalog and Roadmap Process at this time.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

2 - Medium priority.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

4 - Not a priority.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

3 - Low Priority.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

3 - Low Priority.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

3 – Low Priority.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

3- Low Priority.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

2 – Medium Priority.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

3 – Low Priority

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

Cal Advocates provides no additional feedback at this time.

## **Calpine Corporation**

Submitted on 05/15/2026, 04:38 pm

### **Contact**

Chris Devon (chris.devon@calpine.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Transmission Access Charge Enhancements

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

Priority - 2

Calpine supports improving clarity and efficiency for augmentation of operational storage assets where it enhances reliability and operational performance, provided interconnection integrity and cost causation principles are preserved.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

Priority - 4

Calpine supports transparent and market-based pathways for energy-only resources to obtain deliverability, where grounded in physical capability and system needs. Cost responsibility should reflect incremental impacts and energy-only resources should not be unfairly advantaged compared to other resources for deliverability allocations.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

Priority - 2

MIC provisions should be improved to provide more stability and ensure competitive outcomes. Imports are critical to reliability and price formation, while the MIC framework is key to ensure reliable import simultaneous deliverability. Calpine supports MIC enhancements grounded in operational reality.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

Priority 1

Calpine supports revisiting TAC structure enhancements to improve alignment with cost causation principles, including the role of peak demand in transmission cost allocation. Any TAC reforms should preserve competitive neutrality, avoid distortive cost shifts, and ensure charges reflect actual system use. Care should be taken to prevent changes that influence siting or dispatch decisions through administrative cost reallocation rather than market signals.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

Priority - 2

Calpine supports improved stress-testing and adaptability analysis in transmission planning where it enhances reliability under evolving conditions and complements existing processes.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

Priority - 4

Aligning transmission planning with evolving grid and RA needs is important, but reforms should

remain resource agnostic, and rely upon resource capabilities, performance, and market-based approaches, rather than prescriptive infrastructure mandates.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

Priority - 4

While Calpine opposes prioritization of this effort at this time, we support future efforts to reform evaluating non-wires alternatives, including long-duration storage, where they demonstrate cost-effectiveness and reliability comparable to traditional transmission.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

Priority - 2

Calpine strongly supports comprehensive alignment of planning, interconnection, and deliverability processes consistent with FERC Order 1920 to improve efficiency, transparency, and competitive access.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

Given limited ISO and stakeholder bandwidth, infrastructure initiatives should prioritize near term implementability and clear reliability or efficiency benefits.

Policy work should focus on improving alignment across planning, interconnection, and market frameworks, rather than introducing novel or independent constructs.

Competitive neutrality, market-driven solutions, transparency for cost causation, and cost causation based cost allocation should remain guiding principles for all infrastructure policy development.

## **CPUC**

Submitted on 05/15/2026, 03:19 am

**Contact**

Simon Hurd (simon.hurd@cpuc.ca.gov)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Energy Division Staff (Staff) of the California Public Utilities Commission (CPUC) develop and administer energy policy and programs to serve the public interest, advise the CPUC, and ensure compliance with CPUC decisions and statutory mandates. Staff provide objective and expert analyses that promote reliable, safe, and environmentally sound energy services at just and

reasonable rates for the people of California.<sup>[1]</sup> Further, Staff advocate on behalf of California ratepayers at the Federal Energy Regulatory Commission (FERC), under whose jurisdiction CAISO's transmission planning falls.

Staff appreciate the CAISO's focus on infrastructure initiatives and the opportunity to comment on Stakeholders' proposals. The CPUC takes no position on prioritizing the proposed initiatives.

[1] More information about the CPUC Energy Division is available at:  
<https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division>

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

The CPUC takes no position on this initiative at this time.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

The CPUC takes no position on this initiative at this time.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

The CPUC takes no position on this initiative at this time.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

Priority: 3 - Low

The proposed High Voltage (HV) TAC reforms are intended to make usage of the transmission system more efficient while more accurately reflecting causation in allocation of costs.

From the CPUC's perspective, in isolation, the reforms will likely not result in the desired increased efficiency and equitable cost allocation. However, because the majority of transmission revenue requirement is borne by retail ratepayers, and those ratepayers' costs are allocated by retail rate design, the impact of HV TAC reform should be considered in combination with retail rate design changes under consideration in the Commission's new rulemaking on California Advanced Electric Rate Design.

As High Voltage TAC reform in combination with retail rate design could more effectively achieve the

stated goals, the Commission looks forward to continuing to collaborate with the CAISO and other Stakeholders on equitable allocation of transmission costs to ratepayers.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

The CPUC takes no position on this initiative at this time.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

The CPUC takes no position on this initiative at this time.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

The CPUC takes no position on this initiative at this time.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

The CPUC takes no position on this initiative at this time.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

The CPUC looks forward to the opportunity to engage in future infrastructure-related initiatives.

## **EDFps**

Submitted on 05/15/2026, 04:20 pm

**Submitted on behalf of**  
EDF power solutions

### **Contact**

Raeann Quadro (rquadro@gridwell.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Comprehensive Alignment Post Order 1920, battery storage enhancement procedures, and affected systems are EDFps top concerns.

**2. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

EDFps supports this item as a high priority, and provides the following informational analysis for consideration as CAISO develops the initiative topic.

EDFps requests that the CAISO open an initiative to establish tariff and BPM provisions addressing battery storage augmentation and equipment replacement activities that maintain existing operational capability without requiring a full Material Modification Assessment (MMA).

Battery degradation and augmentation are normal and expected aspects of operating battery storage facilities. Depending on chemistry, dispatch profile, and environmental conditions, battery systems may experience approximately 2–3% annual degradation, requiring periodic replacement or augmentation of battery racks and associated equipment to maintain contracted duration, capacity, and Resource Adequacy value.

Example:

| Operating Year | Approximate Remaining Capability |
|----------------|----------------------------------|
| Year 1         | 100%                             |
| Year 2         | 97.5%                            |
| Year 3         | 95.0%                            |
| Year 4         | 92.5%                            |
| Year 5         | 90.0%                            |
| Year 6         | 87.5%                            |

For a 100 MW / 400 MWh resource, this equates to approximately 350 MWh by Year 6 absent augmentation.

Today, however, routine augmentation activities frequently trigger the MMA process even where:

- injection capability is unchanged,
- the project remains within originally studied parameters, and
- the work is intended solely to maintain existing operational capability.

At the same time, MMA reviews are already significantly backlogged, with many reviews taking six months or longer. As the number of operational storage facilities grows, routing routine augmentation activities through the MMA process risks creating unnecessary administrative burden

without corresponding reliability or transmission benefits.

The CAISO already recognizes “Permissible Technological Advancements” (PTAs) as a mechanism to accommodate reasonable technology evolution over a project’s life. Operational battery augmentation and replacement activities should be more clearly addressed within that framework.

Accordingly, EDFps requests that the CAISO evaluate:

- clearer criteria for like-for-like substitutions,
- predefined screening thresholds,
- streamlined review timelines,
- notice-based processes for limited augmentation activities, and
- clearer guidance regarding when a PTA is sufficient versus when an MMA is required.

This proposal is not intended to create a pathway for projects to increase injection capability or avoid necessary interconnection studies. Rather, the objective is to ensure that routine maintenance and augmentation activities that do not materially change system impacts can proceed through a more efficient review pathway.

If the CAISO is not prepared to initiate this effort at this time, EDFps requests that the CAISO publish a report summarizing the last five years of PTA requests, including:

- technology type,
- modification category,
- whether the request was accepted or rejected,
- the basis for the determination,
- whether an MMA was ultimately required, and
- recurring technical concerns identified by the ISO.

Such information would improve transparency and help stakeholders better understand how the PTA framework is being applied to operational storage resources.

**3. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

**4. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

**5. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

**6. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission**

**submission (Sonoma Clean Power)**

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

EDFps believes this is a high priority issue.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

Although Affected System coordination reform was not specifically raised during earlier stakeholder meetings, EDF believes the need for additional policy consideration has become increasingly clear in the interim based on ongoing interconnection experience and stakeholder discussions. In particular, growing concerns regarding late-stage study uncertainty, inconsistent coordination practices, and post-COD mitigation requests have elevated Affected System process reform into a high-priority interconnection issue that warrants consideration as part of this initiative.

This proposal recommends that CAISO initiate a stakeholder effort focused on improving coordination, transparency, and procedural consistency for Affected System studies across the Western Interconnection. As regionalization continues to mature, the industry is increasingly moving toward collaborative and voluntary coordination frameworks that improve efficiency and reliability while preserving operational autonomy for participating entities. Affected System coordination represents a logical area for further regional collaboration.

Affected System issues routinely create major delays, cost uncertainty, and procedural inefficiencies for projects interconnecting to the CAISO grid. Under the current framework, generators are often required to complete separate bilateral study processes with neighboring systems before CAISO will allow synchronization, even though there is limited standardization regarding study assumptions, timelines, mitigation methodologies, proportionality standards, or dispute resolution processes.

In practice, Affected System processes frequently:

- delay projects for many months or years,
- require repeated studies with changing assumptions,
- produce shifting mitigation scopes and agreements,
- assign costs that may extend beyond a project's actual incremental impact,
- and in some cases introduce new mitigation requests very late in development or even after commercial operation has already occurred.

Developers, transmission providers, neighboring systems, consultants, and CAISO staff are all required to devote substantial time and resources to overlapping and often duplicative coordination efforts. At the same time, many neighboring systems — particularly smaller or non-FERC-jurisdictional entities — may face resource constraints and limited engineering or regulatory staffing while managing increasingly complex interconnection requests.

CAISO is uniquely positioned to help facilitate a broader regional discussion regarding these challenges. Through RC West and existing interregional coordination activities, CAISO already maintains extensive visibility into neighboring system conditions, transmission constraints, reliability coordination processes, and regional planning efforts across much of the Western Interconnection. The foundation for greater coordination already exists.

Accordingly, CAISO should consider convening a dedicated stakeholder initiative or working group focused on Affected System coordination reform and regional process improvements. The purpose of such a working group would not be to eliminate legitimate Affected System protections or override neighboring system autonomy, but rather to collaboratively evaluate whether more standardized and coordinated approaches could improve efficiency, predictability, and transparency for all parties.

Topics for consideration could include:

- standardized study assumptions and modeling practices,
- clearer timelines for impact identification and study completion,
- improved data-sharing protocols,
- proportionality standards for upgrade responsibility,
- greater transparency into study methodologies and assumptions,
- dispute resolution or technical review pathways,
- expectations regarding study finality and limitations on late-stage or post-COD mitigation requests absent material system changes,
- and opportunities for coordinated regional transmission solutions rather than project-by-project mitigation approaches.

CAISO could also explore whether successful collaboration through such a working group could eventually support development of a voluntary, opt-in regional framework for coordinated Affected System review processes hosted or facilitated by CAISO. Similar voluntary coordination models are increasingly emerging elsewhere as regional transmission coordination evolves and interconnection challenges become more interconnected across balancing authority boundaries.

Importantly, any future framework should remain voluntary, preserve each participating entity's operational control and reliability responsibilities, and recognize the unique regulatory structures applicable to different systems throughout the West. The goal is not centralization for its own sake, but rather the development of practical regional coordination tools that reduce unnecessary delays, duplicative studies, late-stage uncertainty, and administrative burdens while maintaining reliable system operations.

California and the broader Western Interconnection increasingly depend on timely interconnection of new generation and storage resources. A collaborative stakeholder effort focused on Affected System coordination could represent an important step toward improving regional interconnection efficiency, financing certainty, and transmission planning coordination across the West.

Submitted on 05/15/2026, 05:01 pm

**Contact**

Margaret Miller (margaret.miller@engie.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

ENGIE NA's top priorities for the infrastructure roadmap in 2026 are the CALCCA proposal for EO resources seeking deliverability, Sonoma Clean Power's Proposal for Reliability Modernization and EDF Renewables proposal for Comprehensive Alignment Post-Order 1920.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

ENGIE supports this submission as medium priority. Given the volume of batteries online and coming online in the coming years this could impact many BESS assets meeting full RA requirements

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

ENGIE strongly supports this initiative as high priority. Refining opportunities for Energy Only Resources to seek deliverability should be addressed in the next upcoming IPE stakeholder process

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

ENGIE supports enhancing the MIC process as medium priority.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

This initiative is low priority for ENGIE

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

This initiative is low priority for ENGIE

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

ENGIE supports this proposal as high priority and agrees that CAISO's deliverability studies need to be updated to align with what the current RA slice of day program requires for RA compliance. EO resources should be recognized for the value they can provide in supporting system reliability which includes energy sufficiency. This should be addressed in a future IPE stakeholder process.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

ENGIE would support consideration of SATA for all storage types not just long-duration as medium priority and believe precedence has been set by CAISO for some of this already in the TPP. If this discussion were to be limited to long duration only though, this would be low priority for ENGIE

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

ENGIE supports this submission as a high priority for the 2026 infrastructure roadmap and encourages CAISO as part of this initiative, to consider additional TPD transparency and process improvements.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

## **MRP**

Submitted on 05/15/2026, 03:08 pm

### **Contact**

Tina Chase (tchase@mrpgenco.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Middle River Power LLC (MRP) recommends that CAISO prioritize NextEra's proposal for Streamlined Augmentation of Operational Batteries. As NextEra's March 11 comments and April 8 presentation explain, the battery storage fleet has grown rapidly, and absent development of a simplified process for augmentation, the number of material modification amendment requests is likely to increase as the fleet begins to age. NextEra's recommendation would reduce the administrative burden on CAISO and facilitate timely battery storage maintenance activities. Given these benefits, CAISO should prioritize this proposal.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

1. High Priority: please see MRP's response to Question 1.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

No position.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

No position.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

No position.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

No position.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

No position.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

No position.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

No position.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

No additional comments at this time.

## **NextEra Energy Resources**

Submitted on 05/15/2026, 11:57 am

### **Contact**

Jasmie Guan, NextEra (jasmie.guan@nexteraenergy.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

NextEra Energy Resources, LLC, "NextEra Energy Resources," appreciates the opportunity to submit comments into the 2026 Infrastructure policy catalog and roadmap process. Given CAISO's finite resources, NextEra Energy Resources believes that CAISO should focus on NextEra's Streamlined Augmentation of Operational Batteries and Sonoma Clean Power's (SCP's) Reliability Modernization proposal. NextEra Energy Resources believes its proposal is low-hanging fruit for the CAISO as it relieves administrative burden while ensuring that current and future operational batteries are able to serve their capacity commitments. NextEra Energy Resources also believes SCP's proposal warrants high priority to evaluate the role of Energy-Only (EO) resources for resource adequacy, especially with the California Public Utilities Commission's (CPUC) new Slice of Day resource adequacy construct. NextEra Energy Resources encourages CAISO to incorporate the proposal into the final catalog.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

NextEra Energy Resources is appreciative of the opportunity to present its proposal on April 8 and believes that this proposal should be a high priority for the CAISO to improve the reliability of operational battery storage assets. This will also reduce the expected increase in administrative burden as more batteries reach the point of their first augmentation and submit material modification study requests. As noted in NextEra's presentation, as of March 1, 2026, the total installed battery capacity in the CAISO footprint is nearly 16GW, with more expected to come online per the current interconnection queue. Given that each battery typically requires at least four augmentations over a 20-year period, NextEra Energy Resources urges the CAISO to consider NextEra's augmentation process improvement proposal that enables increased confidence in deployed capacity while respecting engineering practices and considerations. Furthermore, NextEra Energy Resources believes this proposal can be implemented through the business practice manual change process and will not require tariff changes. As a result, this proposal can be easily implemented by CAISO.

On the April 8 stakeholder call, NextEra Energy Resources appreciated the California Department of Water Resource's question regarding the rationale for selecting a 100A threshold for the proposed

incremental short circuit current limit under the proposed process. NextEra Energy Resources notes that this suggested threshold is designed to ensure that an augmentation action does not present a risk to existing interconnection facilities, limiting the effective maximum size of an augmentation action under the proposed process. It also provides a mechanism for large-scope actions that exceed this threshold to be studied under existing modification processes for material impact. NextEra Energy Resources is open to further discussion with CAISO and the Participating Transmission Owners (PTOs) to determine an appropriate short circuit threshold that balances the operational needs of deployed battery storage assets with reasonable limits on maximum augmentation size eligible for this process. NextEra Energy Resources looks forward to working with CAISO and the PTOs to align on the appropriate short circuit current threshold.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

No comment.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

No comment.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

No comment.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

No comment.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

NextEra Energy Resources appreciates SCPs' proposal seeking to align the CAISO's deliverability and resource adequacy practices to better incorporate the role of energy-only (EO) resources. This should be high priority. NextEra Energy Resources continues to support CAISO to consider avenues to allow EO resources to count towards CPUC resource adequacy (RA) requirements, or at minimum, charging sufficiency requirements within the CPUC's RA program. NextEra Energy Resources submitted comments within the CPUC RA Track 1 proceeding on this matter and understands that further CAISO studies are needed to determine whether EO resources can meet

charging sufficiency requirements.<sup>[1]</sup> As CAISO stated in their CPUC RA Track 1 Opening Comments, they are committed to conducting an off-peak deliverability study.<sup>[2]</sup> The preliminary results are targeted by November 2026. NextEra Energy Resources agrees with the CAISO's approach and urges CAISO to complete the off-peak deliverability assessment on schedule for stakeholder review.

<sup>[1]</sup> COMMENTS OF NEXTERA ENERGY RESOURCES ENERGY RESOURCES, LLC ON TRACK 1 PROPOSALS, Rulemaking (R.)25-10-003, Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations, March 6, 2026. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M602/K766/602766086.PDF>

<sup>[2]</sup> OPENING COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON TRACK 1 PROPOSALS, R. 25-10-003, Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations, March 6, 2026. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M601/K896/601896043.PDF>

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

No comment.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

NextEra Energy Resources conceptually supports EDF's proposal to ensure alignment between the generator interconnection process, transmission plan deliverability allocation process, and the transmission planning process. This should be medium priority. NextEra Energy Resources recognizes that CAISO will be transitioning into a biennial transmission planning process starting 2028 for the 2030 comprehensive plan<sup>[1]</sup>, while the interconnection cluster window openings continue on an annual basis. The CAISO should carefully consider how the deliverability assumptions will be made during the "off cycle" year as the new zonal interconnection process primarily relies on the annual transmission plan to determine the transmission plan deliverability (TPD), merchant, and energy-only interconnection zones. NextEra Energy Resources encourages CAISO to open up a stakeholder discussion to discuss how the biennial transmission planning process will feed into the generator interconnection and deliverability allocation processes that operate on an annual basis.

<sup>[1]</sup> CAISO. Tariff Amendment to Comply with Order 1920, December 9, 2025.

<https://www.caiso.com/documents/dec-9-2025-tariff-amendment-order-no-1920-compliance-filing-er-26-704.pdf>

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

No comment.

## **Pacific Gas & Electric**

Submitted on 05/15/2026, 08:52 pm

### **Contact**

Igor Grinberg (ixg8@pge.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide these comments on the stakeholder proposals for the 2026 Infrastructure Policy Catalog and Roadmap Process.

PG&E recommends the CAISO prioritize the Maximum Import Capabilities (MIC) Enhancements proposal, however as described in comments below, PG&E suggests the proposal be taken up in the Market Policy Catalog and Roadmap process rather than in the Policy Infrastructure venue

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

While PG&E appreciates NextEra seeking opportunities to further streamline the battery augmentation process, PG&E believes the proposal to bypass the Material Modification Assessment (MMA) when a battery storage resource adds additional battery units and inverters and only require a direct notification and submission of a technical package to CAISO could introduce reliability and protection risks that warrant continued engineering review through the MMA process

In particular, the addition or replacement of inverters directly affects MVA contribution, fault current at the point of interconnection, and protection settings—impacts that are not captured by MW export limits alone and require updated engineering (including protection) studies to ensure system safety. PG&E is also concerned that applying technical thresholds on a per-augmentation basis, rather than cumulatively, could allow repeated incremental inverter additions to unintentionally bypass fault-current review.

It is also worth noting that current MMA process is already relatively streamlined, with recent PG&E examples demonstrating initial review completion within weeks and total timelines closer to a couple of months when high-quality data packages are provided upfront. Given this, PG&E does not believe that a significantly faster process could be implemented without increasing risk to the system, particularly if equipment changes are permitted without prior engineering notification or review.

For these reasons, PG&E recommends that CAISO retain the existing MMA review framework and

considers the proposal to not be a priority at this time.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

PG&E has no comments at this time but reserves the right to provide further comments on any concerns in the future.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

PG&E is aware that the Maximum Import Capability (MIC) Enhancements proposal was submitted in both the Market Policy and Infrastructure Policy Catalog and Roadmap processes. PG&E supports this proposal and recommends it be designated as a high priority. However, PG&E believes the topic is better suited – given the market design and operational flexibilities associated with MIC – to be addressed under the Market Policy Catalog and Roadmap process, where PG&E's detailed comments on the proposal are being submitted.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

PG&E has no comments on this proposal at this time but reserves the right to provide additional comments in the future.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

PG&E is generally supportive of the concept of incorporating additional scenarios and sensitivities into transmission planning to better hedge against resource portfolios used for planning diverging from actual development pipelines, and other uncertainties. However, PG&E notes that FERC Order 1920 already requires CAISO to evaluate multiple divergent long-term scenarios as part of its compliance framework, which may substantially address the objectives outlined in Sonoma Clean Power's proposal. For these reasons, PG&E recommends that CAISO fold any enhancements to adaptability testing into the ongoing Order 1920 implementation process to avoid duplicative efforts.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

PG&E has no comments on this proposal at this time but reserves the right to provide additional comments in the future.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

PG&E has no comments on this proposal at this time but reserves the right to provide additional comments in the future.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

PG&E acknowledges the importance of ensuring alignment across interconnection and transmission planning processes following the implementation of FERC Order 1920 requirements, but notes that this topic may not necessitate an initiative. Rather, CAISO could host a workshop to help all stakeholders develop a clear understanding of how the new process will work and how it will align with the existing generator interconnection process and transmission plan deliverability (TPD) allocation timelines. A collaborative forum of this nature would provide an efficient and practical means of addressing stakeholder questions and ensuring process alignment without the need for a separate, formal initiative.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

## **Peninsula Clean Energy**

Submitted on 05/15/2026, 02:51 pm

### **Contact**

Doug Karpa (dkarpa@peninsulacleanenergy.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Peninsula Clean Energy (or Westlight Energy, starting in July) prioritizes MIC enhancements as our top initiative. Our goal of serving our load with 100% renewable energy in all hours, and recent procurement orders from the CPUC both require clean firm resources, such as advanced geothermal, and wind resources capable of generating reliably in winter and nighttime hours. These resources are almost certainly going to be either primarily or exclusively available outside of California. Thus, being able to secure import rights in full in the online year, with certainty, is fundamentally critical to the procurement needed for a clean reliable system. Since the existing system is complex and difficult to work with, PCE prioritizes adjustments to meet the procurement needs of the early 2030s and beyond.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

1

**4. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

1

**5. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

**6. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

**7. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

**8. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

**9. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

**10. Do you have any additional feedback or suggestions that you’d like the ISO to consider?**

Peninsula Clean Energy places the highest priority to including within the Resource Adequacy Modeling and Program Design (“RAMPD”) initiative a comprehensive review of the practices and policies for quantifying, assigning, transferring, and utilizing Maximum Import Capability (“MIC”) to support eligibility of import resources to provide Resource Adequacy (“RA”) capacity. Multiple stakeholders have expressed the view that limitations on availability of MIC impose significant barriers to use of import resources for RA purposes. Consideration of MIC Enhancements should include analysis of the causes for limitations on MIC availability and comprehensive exploration of both short-term and long-term measures that could mitigate the adverse impacts of MIC limitations, including consideration of relaxing MIC requirements for import RA eligibility under defined circumstances.

Peninsula Clean Energy strongly urges the CAISO to pursue MIC Enhancements as part of the RAMPD initiative, rather than under a separate Infrastructure-related initiative. MIC policy and implementation are inextricably intertwined with RA policy and implementation. Indeed, MIC has no role in the CAISO markets other than to establish eligibility for import resources to supply RA capacity. It is critical that consideration of enhancements to MIC determination and application be fully integrated with, informed by, and supportive of RA policy and objectives. Although many enhancements can be executed without any change to the simultaneous deliverability study that falls within the scope of the infrastructure group, no reforms can be conducted without a strong consideration of the market and policy impacts. Thus, the Policy group is the appropriate forum for this discussion.

## Rev Renewables

Submitted on 05/15/2026, 03:46 pm

### Contact

Rena Steichen (rsteichen@revrenewables.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

REV Renewables (REV) supports the NextEra BESS augmentation proposal as the highest priority.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

REV supports this as a High Priority policy. Given the growing BESS fleet and the need to maintain committed capacity levels, it is important there is a streamlined process to allow resources to augment their projects. Augmentation involves limited changes to the facility, as it is not changing POI limits or fuel source, but it may include different batteries or inverters. The current MMA process that can take a year or more does not support timely improvements needed to maintain capacity in the storage fleet. REV understands that some level of study, such as short-circuit or stability analyses, may be required to enable augmentation. However, REV requests a more streamlined process to provide more certainty for the project timeline and approval.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

## **SCE**

Submitted on 05/15/2026, 02:07 pm

### **Contact**

Jonathan Lawson Rumble (jonathan.rumble@sce.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

SCE believes that the NextEra proposal for the streamlined augmentation of operational batteries submission should be the highest priority of the offered proposals for exploration in 2026. This effort is widely applicable and will be increasingly more important as the grid penetration of batteries further expands. Further, given the focus of CAISO on the Large Load Interconnection, which will require substantial resources/stakeholder effort, CAISO should have a very high bar to launch any interconnection/transmission-related initiative in the next couple of years.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries**

**submission (NextEra)**

(1) See above

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

(3) While SCE agrees that there is a need to address the ability of existing EO resources to seek deliverability, it is not the highest priority infrastructure policy issue.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

(1) SCE agrees that a substantial effort is needed to evaluate and enhance the MIC process. The availability of MIC is increasingly tight and the expected requirements for new out-of-state resources will put further pressure on the process, which should motivate CAISO to ensure the MIC process is efficient, transparent, and maximally effective.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

(4) SCE does not believe that this proposal should be prioritized at this time.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

(4) SCE does not believe that this proposal should be prioritized at this time.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

(4) SCE does not believe that this proposal should be prioritized at this time.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

(4) SCE does not believe that this proposal should be prioritized at this time.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

(4) SCE does not believe that this proposal should be prioritized at this time.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

No

## **Six Cities**

Submitted on 05/15/2026, 04:58 pm

**Submitted on behalf of**

Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California

**Contact**

Margaret McNaul (mmcnaul@thompsoncoburn.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

The Six Cities support prioritization of policy submission no. 3 below, which is the submittal related to the expansion of opportunities for energy only projects to seek additional deliverability allocations.

As discussed in response to submission no. 4 below, the Six Cities place the Maximum Import Capability Enhancements initiative as a high priority, but view this initiative as properly within the scope of the Resource Adequacy Modeling and Program Design initiative.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

This initiative is not a priority for the Six Cities, but the Cities do not oppose consideration of options to address the underlying concerns.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

The Six Cities agree that this initiative is a high priority. Expanding opportunities for in-service energy only resources to obtain deliverability allocations appears to be an efficient way of expanding the pool of resources that are eligible to provide Resource Adequacy ("RA") capacity.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

This initiative is a high priority for the Six Cities, although the Six Cities support inclusion of this initiative in the Market Policy Catalog and Roadmap, rather than the Infrastructure Catalog and Roadmap.

The Six Cities attach highest priority to including within the Resource Adequacy Modeling and Program Design (“RAMPD”) initiative a comprehensive review of the practices and policies for quantifying, assigning, transferring, and utilizing Maximum Import Capability (“MIC”) to support eligibility of import resources to provide RA capacity. Multiple stakeholders have expressed the view that limitations on availability of MIC impose significant barriers to use of import resources for RA purposes. Consideration of MIC Enhancements should include analysis of the causes for limitations on MIC availability and comprehensive exploration of both short-term and long-term measures that could mitigate the adverse impacts of MIC limitations, including consideration of relaxing MIC requirements for import RA eligibility under defined circumstances. The Six Cities strongly urge the CAISO to pursue MIC Enhancements as part of the RAMPD initiative, rather than under a separate Infrastructure related initiative. MIC policy and implementation are inextricably intertwined with RA policy and implementation. Indeed, MIC has no role in the CAISO markets other than to establish eligibility for import resources to supply RA capacity. Enhancements to MIC determination and application must be fully integrated with, informed by, and supportive of RA policy and objectives.

**5. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

This initiative is not a priority for the Six Cities at this time. In the event that the CAISO and stakeholders elect to advance this initiative, the Six Cities request that the CAISO first provide an updated assessment of projected cost impacts resulting from implementation of the previously-discussed (*i.e.*, in the previous TAC Structure Enhancements initiative) rate design. The Six Cities are concerned that, with the large amounts of new transmission projected to be developed to address load growth, the impacts of any cost shifts among CAISO transmission customers resulting a revised rate methodology may be exacerbated. For this reason, if the change in rate design will result in material TAC cost increases to certain CAISO transmission customers, stakeholders should have the opportunity to consider alternatives to the previously discussed design, including retention of the current rate design.

**6. Please provide your organization’s comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

This initiative is not a priority for the Six Cities at this time, but the Six Cities do not oppose consideration of measures to assess ways in which transmission projects under consideration in the CAISO’s Transmission Planning Process can be more appropriately scoped or their timing accelerated in response to changing conditions. If stakeholders support advancement of this initiative, then the as-submitted proposal would likely benefit from one or more working group meetings to more fully define the scope, problem statements, and desired outcomes to ensure the most efficient use of CAISO and stakeholder resources.

**7. Please provide your organization’s comments on and level of priority (1.high, 2.medium,**

**3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

The Sonoma Clean Power proposal raises a series of interesting questions regarding the potential evolution of the CAISO's RA program in ways that might entail broad changes to the program's purposes and design. To some extent, some of these changes, such as whether energy only projects should be considered as RA resources under certain conditions, may be questions that are best addressed by local regulatory authorities, such as the California Public Utilities Commission or public utility boards and city councils for municipal utilities. However, if the CAISO and stakeholders determine that any of these topics should be addressed through RA policy changes, it is not clear that the Infrastructure Catalog/Roadmap provide the correct forum for this initiative to reside. While the CAISO has the RAMPD initiative underway at this time, the issues in this proposal appear to go beyond those being considered in the RAMPD process, and likely would benefit from a discussion paper to properly scope the initiative. Thus, while the Six Cities do not view this initiative as a near-term priority, there may be value in considering these and related reforms to the RA program in future years.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

This initiative is not a priority for the Six Cities at this time.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

This initiative is not a priority for the Six Cities at this time, but the Six Cities do not oppose consideration of enhancements to the Transmission Planning Process to augment policy changes implemented pursuant to FERC Order No. 1920. It may be preferable to defer this initiative, however, until the CAISO and stakeholders have additional experience with the CAISO's revised processes.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

The Six Cities encourage the CAISO to provide additional information and transparency around the bifurcation of the market policy and infrastructure-related Catalog and Roadmap processes. Does the functional separation of initiatives into these categories also have implications for CAISO staffing and management oversight of initiative topics? Further, how does the CAISO intend to categorize initiatives that have both market policy and infrastructure related implications? Further clarification of how the CAISO's proposes to classify initiatives will aid stakeholders in their understanding of the CAISO's processes.

## **State Water Contractors**

Submitted on 05/15/2026, 09:42 am

**Contact**

Jonathan Young (jyoung@swc.org)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Transmission Access Charge Structural Enhancements.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

4.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

4.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

4.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

1.

SWC believes this initiative would improve grid reliability and create incentives for large loads to shift outside of constrained hours, potentially reducing the need for new transmission investment, reducing strain on existing facilities thereby decreasing maintenance and replacement of these facilities.

Other RTOs and ISOs have addressed this by incorporating coincident peak demand contributions into their transmission charge structures, enabling more accurate cost allocation and better alignment of market behavior with actual grid conditions — an approach CAISO already applies in allocating Local Capacity Requirements to load serving entities within each transmission access charge area.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission**

**submission (Sonoma Clean Power)**

4.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

4.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

4.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

4.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

## **The California Municipal Utilities Association (CMUA)**

Submitted on 05/15/2026, 03:46 pm

**Submitted on behalf of**

The California Municipal Utilities Association's ("CMUA")

### **Contact**

Jessica Melms (melms@braunlegal.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

The California Municipal Utilities Association's ("CMUA") top priorities are #3 and #4.

**2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

No position.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

1.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

1. CMUA urges the CAISO to undertake a comprehensive review of the practices and policies for quantifying, assigning, transferring, and utilizing Maximum Import Capability ("MIC") to support eligibility of import resources to provide Resource Adequacy ("RA") capacity within the Resource Adequacy Modeling and Program Design ("RAMPD") initiative. In making this recommendation, CMUA joins a broad coalition of stakeholders who have found that limitations on MIC availability impose barriers to the use of import resources for RA purposes.

MIC policy and implementation are tightly coupled with RA policy and implementation, and MIC serves no purpose in CAISO markets other than establishing eligibility for import resources to provide RA capacity. In turn, this review should take place under the RAMPD initiative, rather than under a separate infrastructure related initiative.

California LSEs and local publicly owned electric utilities have been directed to or are independently seeking resources that require import into the CAISO to contribute to system reliability. These amounts are growing and include firm clean resources that are vital to reliable grid operations and achievement of decarbonization goals. MIC as it is currently implemented is impeding procurement of these resources. Possible changes to the MIC design need to be considered expeditiously. This initiative is a high priority for CMUA, although CMUA supports inclusion of this initiative in the Market Policy Catalog and Roadmap, rather than the Infrastructure Catalog and Roadmap.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

No position.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

No position.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

No position.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

No position.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

No position.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**

While CMUA recognizes that the catalog division into infrastructure policy and market policy is new, the CAISO team should consider aligning the ranking prioritization processes as between the two categories.

## **Vistra Corp.**

Submitted on 05/15/2026, 02:34 pm

### **Contact**

Cathleen Colbert (cathleen.colbert@vistracorp.com)

**1. Recognizing the finite resources of the ISO and stakeholders, which, if any, policy submissions do you think should be prioritized for exploration in 2026? Please list only your top one or two selections.**

Vistra encourages CAISO to maintain a disciplined 2026 infrastructure roadmap focused on initiatives that are narrowly scoped and pressing matters allowing it to focus on evaluating Cluster 16 procedures as well as taking steps to finalize work related to policy initiatives or FERC and NERC efforts that have already begun.

Vistra encourages CAISO to focus on finalizing efforts already begun including:

**Interconnection process enhancements 5.0** has been approved and is currently in Tariff development after which Tariff filing and implementation work will follow prior to October 2026 ahead of opening Cluster 16 application window.

**Interconnection service capacity and deliverability retention for non-operating generating facilities** is an on-going effort and if approved around July 2026 after which

Tariff filing and implementation work may follow in 2027.

**Resource adequacy modeling & program design** initiative addresses resource planning infrastructure policy requiring staff resources to hopefully resolve policy phase by year end after which Tariff filing and implementation work may follow in 2027.

**Large Loads Initiative** just kicked off as well as NERC on-going work on the topic. This is a particularly novel and challenging subject that would benefit from focus by ISO staff and stakeholders.

**Coordinating with NERC task forces where applicable on FERC Order 909** if ISO assistance is helpful to support the upcoming NERC filings regarding any responsive modifications to the Reliability Standard (~July 2026) or the later expected informational filing 18 months (~January 2027) after the conclusion of the exemption request period in proposed Reliability Standard PRC-029-1, Requirement R4 that assesses the reliability impact of the exemptions to the Standard.<sup>[1]</sup>

**FERC Order No. 881 Market Application & RC Look Ahead Reliability Applications** implementation expected by December 2026.

**FERC Order 1920 transitioning to a new process beginning in 2027** where staff resources will be needed to implement changes and to educate stakeholders on those changes. One of the stakeholder submissions – Comprehensive Alignment Post Order 1920 – appeared to effectively be for a compliance initiative coordinated with stakeholders for Order 1920, which Vistra conceptually supports.

The one new issue brought forward that appears pressing and narrowly scoped is the battery augmentation from NextEra. Vistra supports CAISO resources being used to ensure batteries can augment timely so load-serving entities and suppliers can continue to be able to meet RA obligations with long-term contracted assets without unnecessary disruption.

Vistra encourages the CAISO to map out the regulatory efforts that its staff is engaged in whether in policy phase, Tariff development, or implementation and strategically add only the battery augmentation issue to the already expansive list of efforts. We hope the infrastructure plan will allow for a disciplined approach and a helpful way to track emergent issues if they arise and get added to the plan intra-year.

<sup>[1]</sup> Vistra acknowledges this is largely a NERC workstream but included it to acknowledge CAISO staff may be needed to help advise and support these efforts and the final outcomes will be important clarity to the rules and any resources needed to advise on these efforts are high priority.

## **2. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Streamlined Augmentation of Operational Batteries submission (NextEra)**

**High** - Batteries are degrading and once their state of charge capability degrades below their four-hour continuous discharge capability these assets will need to have their Net Qualifying Capacity reduced to reflect the reduced energy capability. **For those assets that were built planning on augmentations within the contract life of the assets they need to be able to timely complete the augmentation to maintain the contracted service. CAISO should ensure a timely, viable path is available to augment to continue to be able to perform up to the Point of Interconnection for the four-hour minimum duration.** Otherwise, the NQC would need to be reduced and both LSEs and sellers ability to continue to leverage a long-term contracted asset at its originally contracted MW amounts across the four-hour minimum duration. We see this as having a negative impact unnecessarily and support it being expeditiously addressed in 2026.

**3. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Energy Only Resources Seeking Deliverability submission (Cal-CCA)**

Not a priority.

**4. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Maximum Import Capability Enhancements submission (Joint Parties)**

Not a priority.

**5. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Transmission Access Charge Structure Enhancements submission (CDWR and others)**

Not a priority.

**6. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Robust Adaptability Testing in CAISO Transmission submission (Sonoma Clean Power)**

Not a priority.

**7. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Reliability Modernization Initiative submission (Sonoma Clean Power)**

Not a priority.

**8. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Long Duration Energy Storage Transmission Asset submission (GreenGen)**

Not a priority.

**9. Please provide your organization's comments on and level of priority (1.high, 2.medium, 3.low, or 4.not a priority) for the Comprehensive Alignment Post Order 1920 submission (EDF Renewables)**

Vistra conceptually supports the notion of a public process for discussing FERC Order 1920 compliance, however we defer to the CAISO on the specific scoping of that effort and would frame this as already planned work under FERC Order 1920 compliance rather than new initiative.

**10. Do you have any additional feedback or suggestions that you'd like the ISO to consider?**