

2027-2029 Final Infrastructure Policy Roadmap

November 24, 2026

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Introduction and 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.

Infrastructure Policy Catalog and Roadmap Process

The ISO initiated the Infrastructure Policy Catalog and Roadmap process in January of 2026 and invited stakeholder policy submissions in February. The 2026 Infrastructure Policy Initiatives Catalog, posted in July of 2026, described stakeholder infrastructure policy initiative submissions and characterized stakeholder support for these submissions. Proposed policy initiatives described in the Catalog were considered among several other inputs in the prioritization effort that yielded the Draft Infrastructure Policy Initiatives Roadmap in October of 2026, which described 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

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

Stakeholder submissions

In February 2026, 10 stakeholders or stakeholder groups provided 8 submissions[1] for consideration in the 2026 Infrastructure Policy Roadmap and Catalog, all of which are posted on the 2026 Policy Catalog

[1] 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.

and Roadmap webpage[2]. 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 stakeholder comments on each of the submissions. The ISO reviewed stakeholder comments on the relative level of priority for each of the submissions, which are described below.

TABLE 2: 2026 INFRASTRUCTURE POLICY CATALOG SUBMISSIONS

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[3]
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[4]	Maximum Import Capability (MIC) Enhancements

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

[2] 2026 Infrastructure Policy Catalog Initiative – Stakeholder submissions

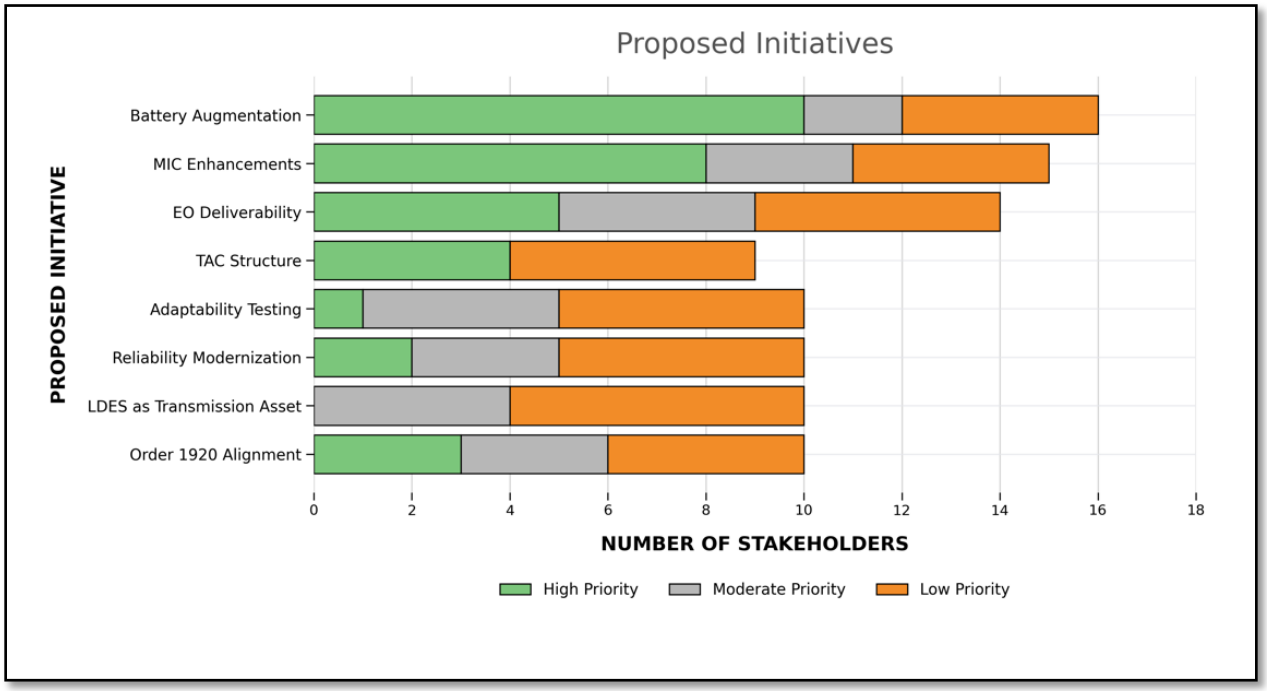
[3] NextEra and the Joint Parties submitted the same policy submissions into both the ISO market and infrastructure policy catalogs, and the ISO is capturing them here in the Infrastructure Catalog.

[4] (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).

are available on the 2026 Infrastructure Policy Catalog and Roadmap webpage[5]. Following the April workshop, all stakeholders were invited to submit comments to characterize their own level of interest in engaging in each suggested policy topic.[6] 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.

TABLE 3. STAKEHOLDER PRIORITIZATION OF STAKEHOLDER SUBMISSIONS



The stakeholder submissions included in the Catalog were all considered for inclusion in the ISO's 2027-2029 Infrastructure Policy Roadmap, and stakeholder feedback on prioritization was used as one of several inputs to help inform the ISO's internal planning and prioritization process for the Infrastructure Policy Roadmap. The ISO provides dispositions to each of the stakeholder submissions in this Final 2027-2029 Infrastructure Policy Roadmap. In particular, the ISO considered other infrastructure priorities and internal bandwidth for new initiatives in the development of the 2027-2029 Infrastructure Policy Roadmap.

[5] 2026 Infrastructure Policy Catalog and Roadmap webpage
[6] Comments on Stakeholder Presentations

For each initiative listed in the Infrastructure Policy Catalog, the ISO considered reliability and policy objectives. The ISO evaluated the feasibility of undertaking the initiative and how to prioritize the initiative against existing obligations and resource availability.

Draft Infrastructure Policy Roadmap

The ISO posted the Draft Infrastructure Policy Roadmap on October 8, 2026, held a workshop on October 15, 2026. Ten stakeholders submitted comments on November 16, which the ISO reviewed prior to finalizing the 2027-2029 Infrastructure Policy Roadmap.

Stakeholder comments included more detail on suggested topics for the scope of upcoming initiatives, such as Interconnection Process Enhancements (IPE) 6.0 and the transmission planning and Memorandum of Understanding (MOU) coordination initiatives. In instances where the ISO proposes to address submissions in an existing process, the specific stakeholder concerns raised in comments on the draft roadmap will be addressed within the initial scopes of the initiatives. The ISO notes, however, that it is not committing to any specific outcomes of the policy initiatives. Stakeholders also noted both ISO staff and stakeholder bandwidth concerns, noting that the scope of the three-year roadmap is ambitious. Stakeholders also requested clarity on the ISO's decision-making processes, which the ISO seeks to provide in the dispositions below. Some stakeholders objected to the omission of certain policy submissions, particularly Transmission Access Charge (TAC) enhancements but otherwise did not suggest specific changes to the initiatives or timelines proposed in the Draft Infrastructure Policy Roadmap. Several stakeholders supported the draft roadmap.

Final Infrastructure Policy Roadmap

The ISO made minor changes to the Final Infrastructure Policy Roadmap based on stakeholder comments and updated initiative timelines:

1. The ISO added a footnote flagging its intent to submit a supplemental filing to the Federal Energy Regulatory Commission (FERC) in early December of 2026, seeking an extension in the implementation timeline for the Long-Term Regional Transmission Planning component of FERC Order No, 1920.
2. Updated the timeline for implementation of the ISO's Large Loads Enhancements Section 205 filing. The ISO received Board of Governors approval in October 2026 and submitted its filing to FERC in November 2026 with an implementation date of February 2027.

The Final Infrastructure Policy Roadmap can be found in Appendix A of this document. In addition, the ISO reiterates that several stakeholders suggested a number of specific policy items that should be considered in policy initiatives already listed on the Draft Infrastructure Policy Roadmap. The ISO appreciates this stakeholder feedback and will address these specific issues in at least the initial phases of the initiatives.

Dispositions of Stakeholder Submissions

The ISO is committed to ensuring that all proposals receive robust internal and stakeholder review. Prioritization was informed by a number of factors including stakeholder feedback, ISO resources, and

the ISO's assessment of changes needed to meet ISO Strategic Objectives and reliably and efficiently operate the markets and meet regulatory requirements.

TABLE 4. DISPOSITIONS OF STAKEHOLDER SUBMISSIONS

Submission Title	Disposition
Streamlined Augmentation of Operational Batteries	**Assigned to an existing process.** This concept will be addressed in the initial scope of Interconnection Process Enhancements (IPE) 6.0.
Maximum Import Capability (MIC) Enhancements	**Included.** This will be the topic of Resource Adequacy Modeling and Program Design (RAMPD) Track 5.
Energy-Only Resources Seeking Deliverability	**Assigned to an existing process.** This concept will be addressed in the initial scope of IPE 6.0.
Transmission Access Charge (TAC) Structure Enhancements	**Declined.** The ISO believes that the current TAC structure is appropriate and a new initiative to consider TAC reform would draw limited resources away from critical work, without clear or consistent benefit to all consumers.
Robust Adaptability Testing in CAISO Transmission Planning	**Assigned to an existing process.** The robustness of the ISO's planning processes will be explored over the next several cycles of the Transmission Planning Process and as the ISO prepares to implement FERC Order No. 1920 on Long-Term Regional Transmission Planning.
Reliability Modernization Initiative – Align RA Program with Evolving Grid Needs	**Assigned to an existing process.** The ISO has been studying this concept in the 2026-2027 Transmission Planning Process.
Long Duration Energy Storage (LDES) as a Transmission Asset	**Declined.** This topic carries significant policy complexity and would require significant resources from ISO staff and stakeholders.
Alignment of Interconnection and FERC Order No. 1920	**Assigned to an existing process.** This is an ongoing focus at the ISO and will be considered in the 2027 MOU update, Order No. 1920 implementation, and future IPE initiatives.

Appendix A: Final 2027-2029 Infrastructure Policy Roadmap

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Final 2027-2029 California ISO Infrastructure Policy Initiatives Roadmap

		2026	2027				2028				2029			
		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Transmission Planning and MOU Coordination														
	Order No. 1920 Implementation			Implementation*										
	Transmission timeline completion	Ongoing public dialogue												
	MOU update	Policy development					Implementation							
Large Load Interconnection and Study														
	Large Loads Enhancements 205 filing	Decision	Implementation											
	Consideration of permanent flexible interconnection and proximate loads		Policy development			Decision	Implementation							
	Consideration of risk-mitigating		Policy development			Decision	Implementation							
Interconnection Process Enhancements														
	IPE 6.0 (Prior to Cluster 17)	Policy		Decision	Implementation									
	IPE 7.0 (if needed)				Policy development			Decision	Implementation					
	IPE 8.0 (if needed)								Policy development			Decision	Implementation	
Resource Adequacy Modeling and Program Design														
	Track 5: MIC enhancements	Policy development			Decision	Implementation								
Consideration of reactive power from IBRs outside of specified range			Public dialogue				Policy development							

NOTE: All implementation dates listed are

***The ISO plans to submit a supplemental filing seeking to delay implementation of the Long-Term Regional Transmission Planning process under FERC Order No. 1920.**