



California ISO

2025 Material Modification Assessment Cost Report

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1. Executive Summary

1.1 Purpose and Scope

CAISO evaluates a variety of modification requests for Interconnection Customers' generator projects. In doing so, CAISO coordinates with the relevant Participating TO(s), Affected Participating TO(s) and Affected System Operator(s), if appropriate. To provide transparency regarding the cost of material modification assessments ("MMA"), the Tariff requires CAISO to publish cost data for the MMAs annually. This report contains a description of the number, types, duration, and costs of MMA requests completed in 2025.

1.2 Background

The CAISO generally uses the same process and criteria to review modification requests for all generation projects.¹

A high level-depiction of the MMA process is below:



If a Facilities Reassessment is required, the modification assessment can take an additional 60 calendar days. The Facilities Reassessment is initiated after completion of the MMA and the determination that the modification request is not material.

Interconnection Customers are required to provide a deposit for the MMA. MMAs initiated prior to December 17, 2024, had a required deposit amount of \$10,000 and all others initiated after that date were increased to \$30,000. Following the MMA, CAISO invoices for the actual costs incurred for the modification assessment. The invoices include an itemized account of expenses incurred, including those incurred by CAISO, Participating TOs, and third parties at the direction of CAISO or Participating TO. Whenever the actual cost of performing the modification assessment exceeds the modification assessment deposit, the invoice directs the Interconnection Customer to pay the excess amount. If the actual cost of performing the modification assessment is less than the modification assessment deposit, CAISO reimburses the Interconnection Customer the difference.

¹ The MMAs discussed in this report are governed by CAISO Tariff Appendix S, Section 1.3.4; Appendix T, Section 3.4.5; Appendix U, Section 4.4.3; Appendix Y, Section 6.9.2.2; or Appendix DD, Article 6.7.2.2 as applicable, and the BPM for Generator Management.

1.3 Report Summary

1.3.1 Types of Modifications

Interconnection Customer must submit to CAISO, in writing, a request to modify their Project and any information provided in the Interconnection Request or Generator Interconnection Agreement. The variety, content, and scope of modification requests are as unique and complex as the Generating Facilities themselves, but for the purpose of this report, MMA requests are categorized into seven “buckets”:

- 1) Commercial Operation Date (“COD”) extensions and/or requests for project Phasing;
- 2) Technology changes: add battery, update inverters or transformers, and/or equipment changes;
- 3) Interconnection changes: generation tie route changes, Point of Interconnection changes, Point of Change of Ownership changes, and site location changes;
- 4) Technology and Interconnection Changes: Technology and interconnection changes as discussed above;
- 5) COD and Interconnection: COD and interconnection changes as discussed above;
- 6) COD and Technology: COD and technology changes as discussed above; and
- 7) Complex changes: multiple changes including COD, technology, and/or interconnection as discussed above.

1.3.2 Time

The modification assessment commences when CAISO and Participating TO (1) deem the modification request (including all the necessary technical documentation) valid and data complete, and (2) receive Interconnection Customer’s modification assessment deposit. Per the Tariff, CAISO targets providing a written response to Interconnection Customer within a specific timeline. A facilities reassessment may be required after the modification request has been determined to not be material, in which case additional time is allotted to the working teams to complete the Modification Assessment. If the facilities reassessment is unable to be completed within that period, CAISO notifies Interconnection Customer, provides an estimated completion date, and explains why additional time is required.

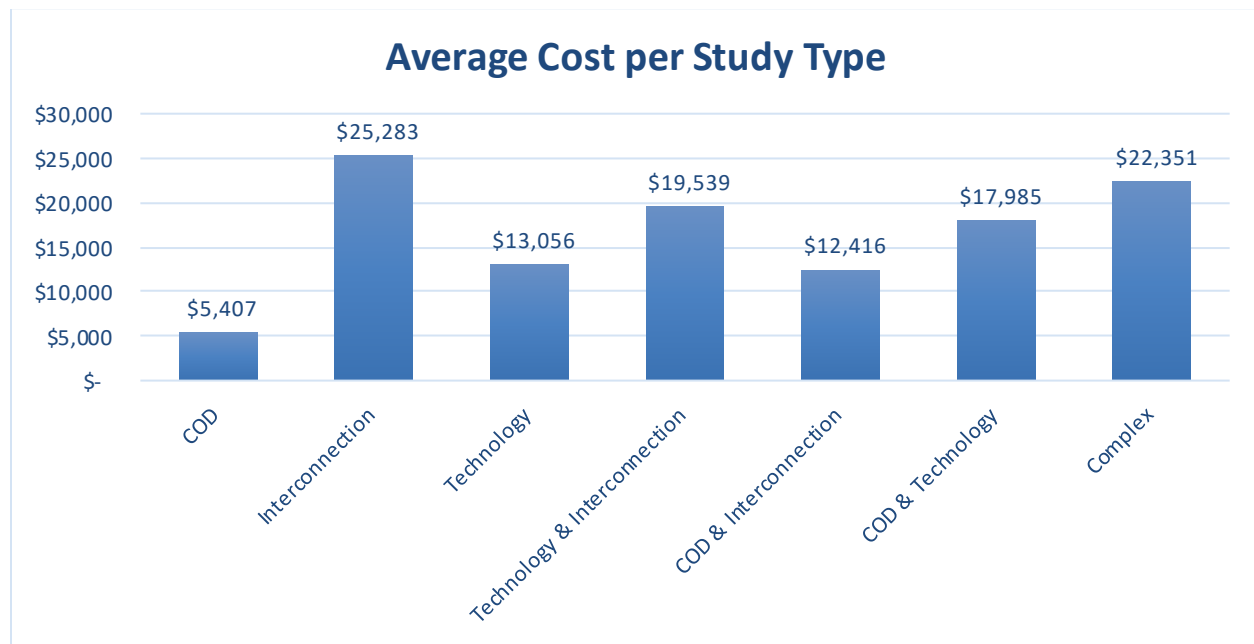
Through Interconnection Process Enhancements (IPE), the MMA cost and timeline was adjusted to accommodate the additional scope of work overtime. All MMAs initiated after the December 16, 2024 effective date require a \$30,000 deposit and have a tariff timeline of 60 calendar days to commence the assessment, with an additional 60 days given in the event of a facilities reassessment, for a total of one hundred and twenty (120) calendar days.

2.0 Report

2.1 MMA Costs

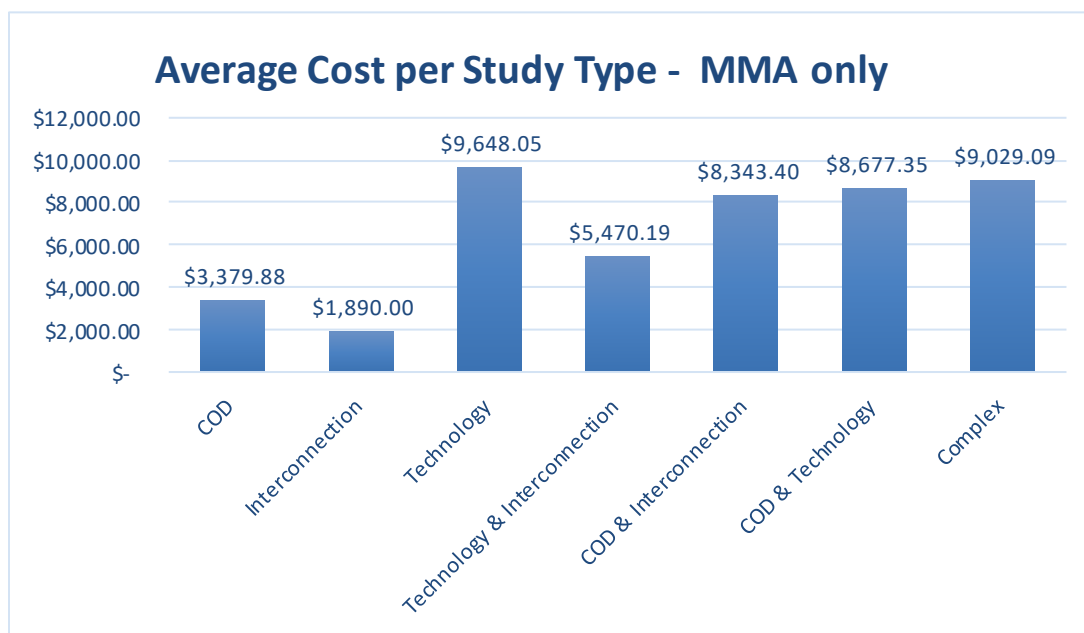
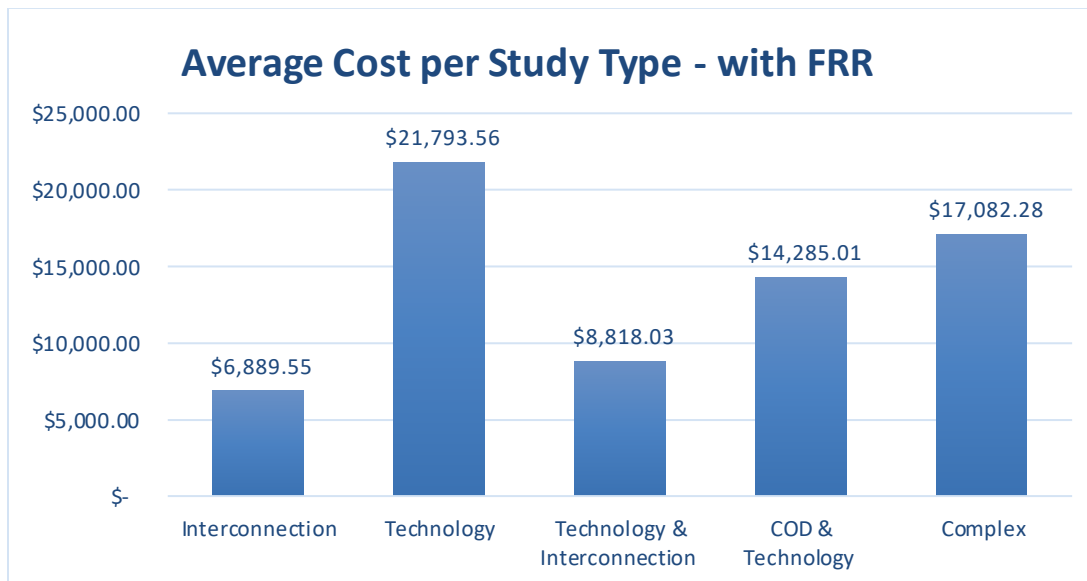
CAISO completed 93 MMA requests in 2025, of which, 7 were cancelled and did not result in a final report being published and 86 modifications were fully completed. Of the 93 received - 23 COD, 21 Technology Changes, 11 Interconnection Changes, 16 Technology and Interconnection, 1 COD and Interconnection, 13 COD and Technology, and 8 Complex (see definitions as defined in section 1.3.1).

The average cost for all MMAs, including canceled MMAs, in 2025 was \$15,285.16. The highest-cost modification assessment was \$52,272.25. The lowest-cost modification assessment was \$1,344.46.²



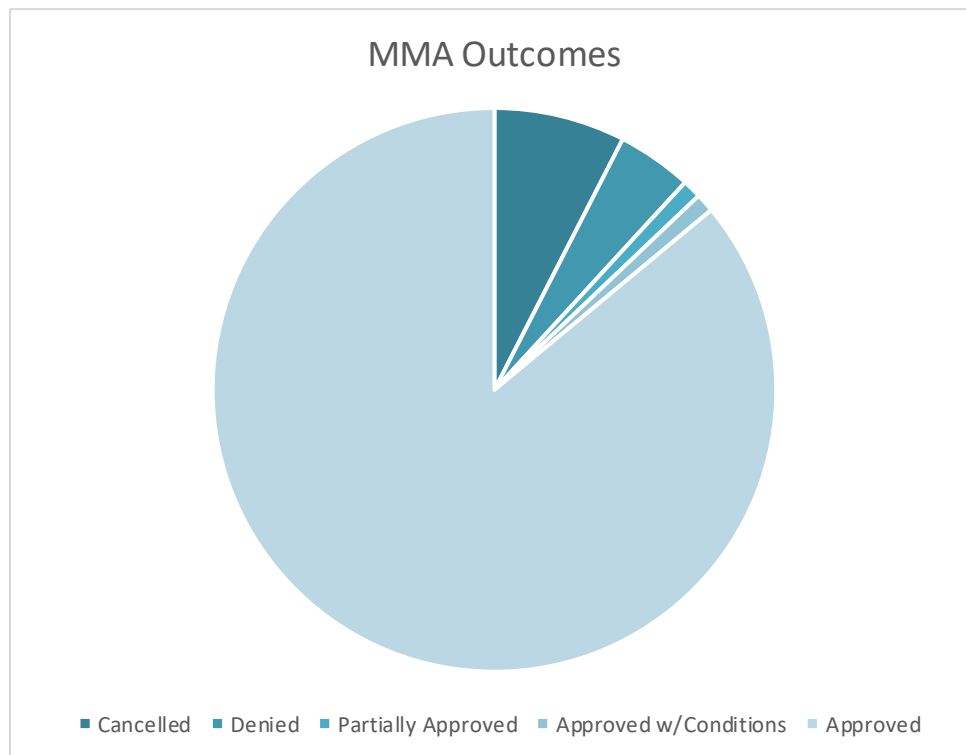
² CAISO tariff requires that "The Participating TO(s) shall invoice the CAISO for any assessment work within seventy-five (75) calendar days of completion of the assessment." These values include MMAs where the CAISO received no invoice from the Participating TO.

Of the 86 complete modifications, 29 required a Facility Reassessment following the modification assessment.



2.2 MMA Outcomes

Of the 93 MMAs processed in 2025, 80 were approved, 4 were denied, 1 was partially approved, 1 was approved with conditions, and 7 were cancelled.

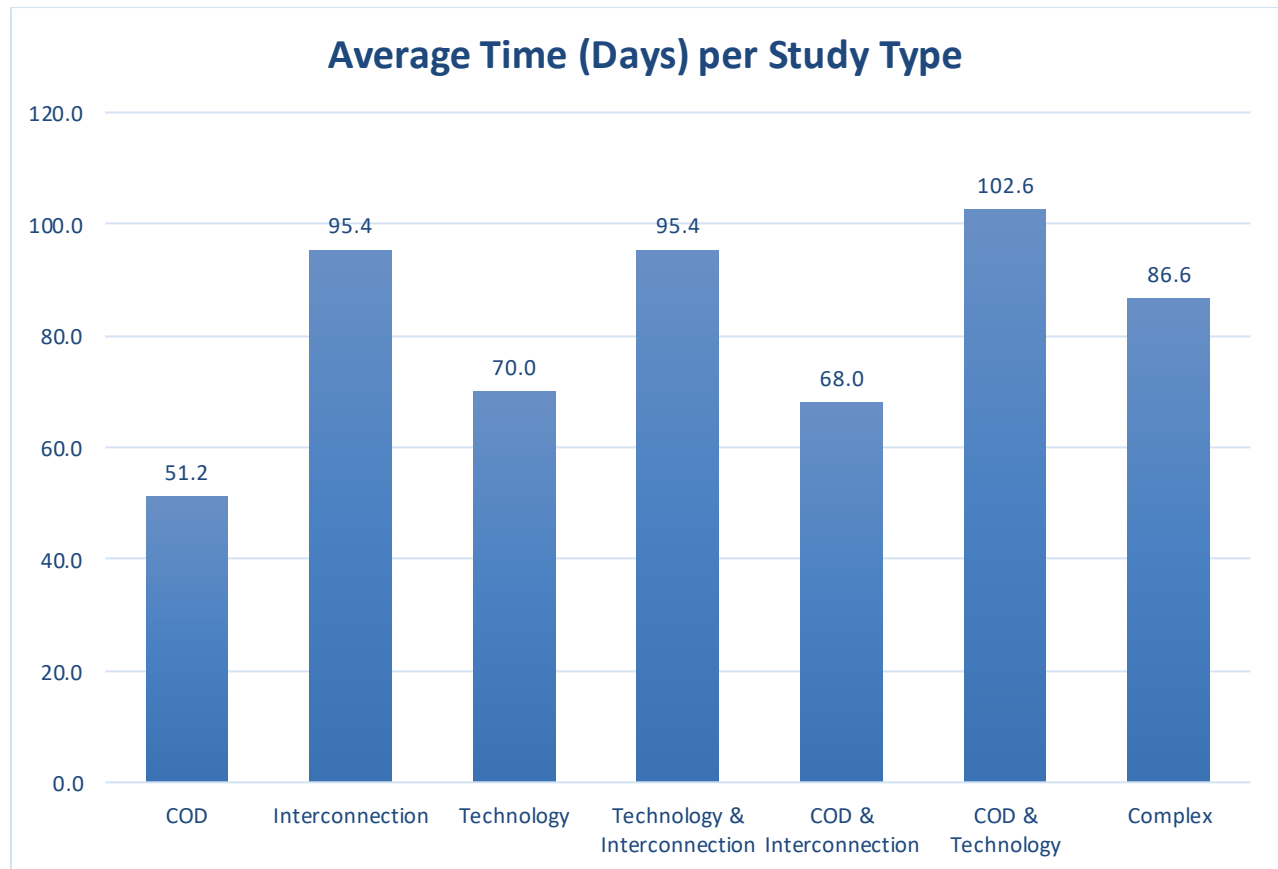


Modifications approved with conditions are actions required of the Interconnection Customer after the results of the MMA are published. For example, a condition may require the execution of the Generator Interconnection Agreement or an Amendment to the Generator Interconnection Agreement by a certain date. Other conditions may apply on a case-by-case basis.

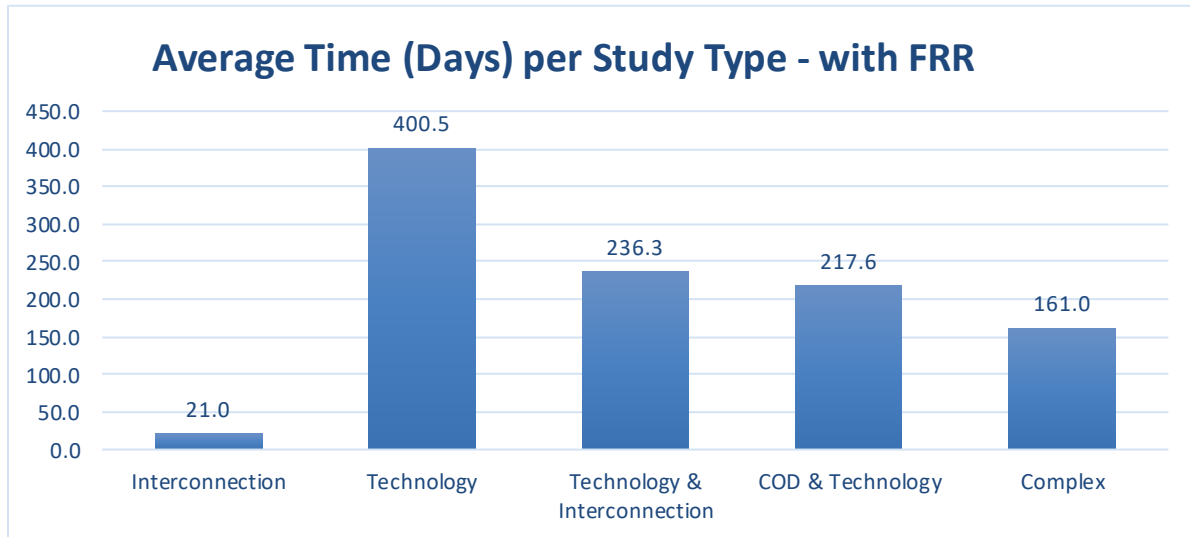
2.3 MMA Average Study Times

Of the 86 MMAs completed in 2025, the average time in the process varied depending upon the complexities of the request. The time starts on the date in which the last Interconnection Request is submitted by Interconnection Customer that is ultimately deemed valid and ends on the date in which CAISO publishes the MMA results to the Interconnection Customer.

In 2025, the average time (in days) per completed study was 83 days. The longest modification assessment was 284 days. The shortest modification assessment was 19 days.



Of the 86 completed modifications, 28 required a Facility Reassessment following the modification assessment. Of the twenty-nine (29), 14 were completed in 120 days or less. Otherwise, 15 of the twenty-nine (29) required more than 120 days to complete.



Of the 58 modifications that did not require Facility Reassessments, the average time (in days) per study in 2025 was 66 days. The longest modification assessment was 259 days. The shortest modification assessment was nineteen (19) days. Five (5) required more than (120) days to complete, 23 required less than 120 days and greater than 60 days, and 36 were completed in 60 days or less.

