

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Electric Integrated Resource Planning and
Related Procurement Processes.

Rulemaking 20-05-003
(Filed May 7, 2020)

**OPENING COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION ON ADMINISTRATIVE LAW JUDGE'S RULING
SEEKING COMMENTS ON ADDITIONAL PROPOSAL FOR A RELIABLE AND
CLEAN POWER PROCUREMENT PROGRAM**

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I. Introduction

The California Independent System Operator Corporation (CAISO) submits opening comments pursuant to the California Public Utilities Commission’s (Commission) June 23, 2026 *Administrative Law Judge’s Ruling Seeking Comments On Additional Proposal For A Reliable And Clean Power Procurement Program* (Ruling) and July 10, 2026 *Email Ruling Partially Granting Joint IOUs’ Request for an Extension of Time for Comments in Response to Administrative Law Judge’s Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*.

The CAISO appreciates the Commission’s continued efforts to develop a Reliable and Clean Power Procurement Program (RCPPP) and the important role of the Ruling in advancing that effort. The CAISO generally supports the additional proposal described in the Ruling (Ruling Proposal), particularly its recognition of RCPMP as a critical bridge to connect Integrated Resource Planning (IRP), transmission planning, and load-serving entity (LSE) procurement.

The CAISO shares the Ruling’s view that RCPMP should serve as a bridge across these planning and procurement functions. This approach is consistent with the 2022 Memorandum of Understanding (MOU) among the CAISO, the Commission, and the California Energy Commission (CEC), which commits to tightening linkages among demand forecasting, resource planning and procurement, transmission planning, and interconnection processes.¹ The CAISO

¹ Memorandum of Understanding Between the California Public Utilities Commission and the California Energy Commission and the California Independent System Operator Regarding Transmission and Resource Planning and Implementation at <https://www.caiso.com/documents/iso-cec-and-cpuc-memorandum-of-understanding-dec-2022.pdf>.

previously identified what it views as the key attributes of an effective long-term procurement framework in this proceeding.^{2, 3} These attributes include: (1) ensuring adequate procurement to provide resource adequacy (RA) in order to meet a 0.1 loss of load expectation (LOLE) in the operational timeframe; (2) providing sufficient lead time for procurement and project development; (3) accounting for implementation and performance risks; (4) supporting both retention of existing resources and development of new resources; (5) enabling alignment across RA and IRP frameworks; and (6) coordinating procurement decisions with transmission planning processes to support timely infrastructure development.

The Ruling Proposal reflects meaningful progress toward tightening the linkage between planning and procurement, and more closely aligns with the above attributes than prior proposals considered in this proceeding. The CAISO is supportive of the overall direction of the framework set forth in the Ruling. However, several modifications would better align the proposal with these key attributes and improve the proposal's ability to achieve the State's reliability and clean energy objectives. The CAISO's comments offer recommendations to help ensure sufficient lead time for project development, support retention of existing resources needed for reliability, align RA and IRP, and ensure procurement decisions are effectively coordinated with transmission planning processes.

II. Responses to Questions for Parties

The CAISO provides responses to selected questions from the Ruling.

Question 3: Is this ruling's proposal preferable to the current ad hoc procurement order process? Why or why not? Compare and contrast benefits and costs as directly as possible.

The CAISO continues to support the establishment of a long-term programmatic procurement framework.⁴ The CAISO supports transitioning the resource procurement process away from reliance on urgency-driven, ad hoc procurement orders and toward a durable procurement framework that sets requirements well in advance of identified system needs through coordinated, forward-looking planning.

Ad hoc procurement orders rely on a "just-in-time" approach that may not adequately reflect the realities of resource development timelines, increasing the risk that project delays,

² CAISO Opening Comments on the 2025 RCPPP Staff Proposal, pp. 2-3.

³ CAISO Opening Comments on the 2022 RCPPP Staff Options Paper, p. 3.

⁴ CAISO Opening Comments on the 2025 RCPPP Staff Proposal, p. 1.

permitting constraints, financing issues, or project failures could result in reliability shortfalls. The Ruling Proposal creates a systematic framework for identifying, quantifying, and addressing procurement needs, eliminating the need to develop a new framework each time a procurement need arises.

A programmatic long-term procurement framework provides greater predictability and certainty for LSEs and project developers, reduces administrative burden, and minimizes the risk that procedural issues delay necessary procurement. It will also help ensure sufficient lead time for resource development, including contracting activities, permitting, financing, moving through the interconnection process, and constructing transmission upgrades when necessary. By establishing procurement requirements on a forward-looking basis, a programmatic framework will better support timely resource development and reduce project development risks.

Question 5: If the Commission were to implement the proposal in this ruling, should the need determination be based on specific identified resources or resource attributes? How (in general) and how (specifically) should the procurement need be expressed?

An effective long-term procurement framework should accomplish the following goals: (1) ensure procurement decisions reinforce planned resource portfolios; (2) ensure planning processes reflect procurement realities; and (3) incentivize procurement of the diverse set of resources (including clean firm and emerging technologies) reflected in planning portfolios in identified locations and on timelines that meet reliability and policy objectives. To achieve these goals, the CAISO recommends expressing need determinations through resource attributes, while also incorporating targeted requirements for resource categories and locations that are critical to reliability and planning outcomes. Need determinations should account for clean firm and dispatchable resources, long-lead time resources, and locational procurement requirements where necessary to maintain alignment among procurement, resource planning, and transmission planning.

Specifically, the Commission should establish procurement needs that reflect:

- Clean firm and dispatchable resource requirements identified through the preferred system plan and any additional base case portfolios adopted through the IRP process;
- Long lead-time resource needs that require procurement actions well in advance of forecasted reliability requirements; and

- Locational procurement needs that align with IRP’s busbar mapping and that support transmission assumptions and solutions identified through the CAISO’s Transmission Planning Process (TPP).

This approach is consistent with the central premise of the Ruling Proposal: Commission-approved LSE plans, which are developed to achieve reliability and emissions goals and inform transmission planning, should guide LSE procurement. Greater specificity in the three areas identified above would provide clear procurement signals while preserving flexibility for LSEs to competitively procure resources that best meet their individual compliance and portfolio management objectives.

Clean firm and dispatchable resources

Need determinations should include explicit procurement requirements for clean firm and dispatchable resources when those resources are relied upon to meet reliability and policy objectives reflected in the preferred system plan. Given expected load growth, ongoing resource retirements, and California’s statutory clean energy goals, clean firm and dispatchable resources are expected to play an increasingly important role in maintaining reliability while supporting the transition to a zero-emission electricity system. Dispatchability, in particular, is a critical resource attribute that enables grid operators to respond to changing system conditions and will be crucial to ensuring reliable grid operations as the state advances toward its clean energy objectives. Absent clear procurement requirements, there is a risk that resource procurement outcomes will not align with the assumptions underlying the adopted portfolio plan.

Long Lead-Time Resources

Need determinations should also account for development timelines associated with clean firm and other long lead-time resources. Many of these resources require lengthy development timelines, complex permitting processes, and, in some cases, significant transmission infrastructure investments before achieving commercial operation. The Commission should establish solid procurement obligations sufficiently in advance of identified system need dates to support timely development and reduce the risk these resources are unavailable when needed.

Locational Procurement

The Commission should more explicitly incorporate locational procurement requirements that align with the IRP’s busbar mapping when establishing procurement obligations. As the Ruling explains, the Commission’s IRP resource portfolio guides CAISO transmission planning,

including assumed zonal location of resources. The TPP identifies and approves upgrades based on the assumption that resources will come online in the locations reflected in the IRP portfolios.⁵

Under the current IRP procurement orders, resource procurement outcomes do not always align with the geographic assumptions reflected in the portfolios transmitted to the CAISO for transmission planning studies. When procurement occurs in locations that differ materially from those assumed in planning, transmission solutions identified through the TPP may no longer support the resources for which they were developed. As a result, coordination between planning and procurement processes is less effective.

To address this concern, procurement requirements should reinforce the locational assumptions embedded in the IRP portfolios sent to the CAISO for the TPP and interconnection process. Better alignment among planned and procured resources (including resource timing, type, amount, and location) will help ensure transmission investments support anticipated resource development. Conversely, significant misalignment could limit the effectiveness of transmission development, hinder resource deployment in preferred locations, and increase the risk of stranded infrastructure investment.

Additionally, greater locational specificity in procurement requirements would better support resource diversity and facilitate the development and interconnection of geographically constrained resources, such as geothermal and out-of-state wind resources, that LSEs have planned to procure based on needs identified through IRP modeling.

Question 10: Comment on the proposed requirement for 100 percent of required resources to be under contract three years out.

The CAISO believes the proposed requirement for 100 percent of necessary resources to be under contract three years out is reasonable and workable. Establishing a standardized three-year procurement horizon provides greater certainty that resources identified through the planning process will advance toward commercial operation on a timely basis.

A three-year contracting requirement provides stronger incentives for procurement activity well in advance of project commercial operation dates, allowing projects to pursue Transmission Plan Deliverability (TPD), progress through the interconnection process, secure

⁵ *Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*, p. 7.

financing, obtain permits, and complete necessary construction activities. The requirement reduces the risk of unmet procurement obligations due to delayed contracting activity and improves the likelihood that sufficient resources will be available to meet reliability needs and State policy objectives.

Question 11: Comment on the proposed requirement for 100 percent of required resources to be online within five years from the date the need is identified and allocated.

The CAISO appreciates the objective of the proposed requirement that 100 percent of required resources achieve commercial operation within five years of need identification and allocation. Timely resource development is important to ensure sufficient resources are available to meet future system needs. However, the CAISO believes additional flexibility is warranted because a uniform five-year online requirement does not adequately account for the development timelines associated with all resource types and could constrain the portfolio of resources available to satisfy procurement requirements.

The CAISO's concerns are twofold. First, a uniform five-year compliance timeline does not provide sufficient flexibility to accommodate resource-specific development considerations, particularly for long lead-time resources that depend on substantial transmission network upgrades. Second, the proposed five-year requirement could narrow the range of resources capable of satisfying procurement obligations, thereby reducing resource diversity, increasing procurement costs, and weakening alignment between resource and transmission planning processes.

The CAISO supports a procurement framework that encourages timely contracting and project development. However, the Commission should provide sufficient flexibility to account for resource-specific development. A uniform five-year compliance requirement may not appropriately reflect the time necessary to develop, permit, interconnect, and construct certain resources and associated infrastructure. Project development timelines are influenced by a variety of factors, including permitting requirements, supply chain constraints, changes in federal policies, financing conditions, interconnection processes, and transmission infrastructure needs. These factors can materially affect a project's ability to achieve commercial operation within a prescribed timeframe, even when procurement activities are initiated promptly.

Project development timeline considerations are particularly relevant for clean firm and other long lead-time resources and projects that depend on significant transmission infrastructure

investments. Certain resources may require major network upgrades or transmission expansions that cannot reasonably be planned, permitted, constructed, and placed into service within a five-year period. Further, simply including resources in a portfolio may not be enough to drive procurement of those resources. For certain clean firm or long lead-time resources, it may be necessary to issue procurement requirements concurrently with transmission approvals to ensure that transmission and resource development and financing occur in tandem.

In addition, the proposed compliance framework provides only two years between the execution of the three-year contracting requirement and the five-year commercial operation requirement.⁶ This timeframe is not feasible for projects that depend on transmission upgrades or other complex development activities. Local transmission upgrades, although generally smaller in scope, often involve similar siting, permitting, and construction timelines. As a result, projects requiring transmission upgrades may face significant challenges in achieving commercial operation within the proposed timeline despite timely procurement and diligent development efforts. Establishing compliance requirements that do not reflect these development realities could increase the risk of compliance deficiencies even where LSEs have undertaken timely and reasonable procurement actions. Although the CAISO has made substantial progress in advancing transmission infrastructure needed to interconnect new resources and serve growing demand, transmission development timelines remain a fundamental constraint on the pace at which new resources can be brought online. The CAISO has approved nearly all transmission projects identified in the 2022 20-Year Transmission Outlook and currently has approximately 60 GW of generation projects associated with network upgrade construction underway, demonstrating significant ongoing investment in transmission expansion. However, future transmission facilities and upgrades will continue to require extensive planning, permitting, siting, engineering, procurement, and construction activities that inherently take many years to complete.

The CAISO is also concerned that a uniform five-year online requirement could narrow the range of resources capable of competing to satisfy procurement obligations. Resources with longer development timelines may be disadvantaged relative to others, even where those resources provide reliability benefits identified through the IRP process. Limiting participation in

⁶ *Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*, p. 11.

this manner could reduce resource diversity, increase procurement costs, and weaken the alignment between resource and transmission planning.

Therefore, the CAISO recommends that the RCPPP compliance framework incorporate timelines that recognize the development characteristics of different resource types, rather than requiring all resources to be online within a uniform five-year period.

Question 18: Comment on the relationship of this proposal to the FERC Order 1920 proposals.

The CAISO supports the proposal to adopt a biennial timeline for resource portfolio development because it supports an efficient and coordinated planning process and aligns with the CAISO's proposed implementation of Federal Energy Regulatory Commission Order No. 1920 (FERC Order 1920). The CAISO appreciates the Commission's continued partnership in supporting transmission planning efforts that advance a reliable, affordable, and sustainable electric system for California.

On December 9, 2025, the CAISO submitted a compliance filing proposing to adopt all of FERC Order 1920's proposed reforms.^{7, 8} The CAISO's filing proposes resequencing the existing annual 10 and 15-year comprehensive transmission planning process to a biennial transmission planning process that includes an annual reliability assessment. This annual reliability assessment would ensure compliance with reliability standards and address urgent reliability needs without waiting for the next biennial transmission planning cycle. The proposal also establishes a 20-year long-term transmission planning process every four years, consistent with the long-term planning requirements of the Order. Based on the results of the annual reliability assessments, the biennial comprehensive transmission planning process, and the four-year long-term transmission planning process, the CAISO would identify and approve transmission upgrades and additions as necessary.⁹

⁷ California Independent System Operator Corporation (CAISO), *Tariff Amendment to Comply with Order No. 1920*, FERC Docket No. ER26-704-000, filed Dec. 9, 2025. <https://www.caiso.com/documents/dec-9-2025-tariff-amendment-order-no-1920-compliance-filing-er26-704.pdf>

⁸ The CAISO's Order No. 1920 compliance filing remains pending before FERC, and the CAISO is awaiting a Commission order on the proposed tariff amendments.

⁹ If the CAISO identifies transmission upgrades and/or additions, including any alternative transmission technologies and non-transmission alternatives thereto, needed to address reliability needs

The CAISO's compliance filing, subject to FERC approval, proposes to complete the first biennial comprehensive transmission plan in the spring of 2030. The CAISO's compliance filing also proposes the first four-year Long-Term Regional Transmission Planning process begin in 2027, with the Long-Term Regional Transmission Plan expected in spring 2030. A biennial RCPPP resource portfolio development process would align with the CAISO's proposed biennial comprehensive transmission planning cycle and support coordination between resource and transmission planning activities.

Question 19: Comment on the relationship of this proposal to the RA program.

The proposal appropriately recognizes that the RA Program and the RCPPP serve distinct but complementary functions. As the Ruling notes, the RA program is intended to ensure sufficient resources are contracted to maintain near-term reliability, and the RCPPP is intended to support procurement needed to satisfy longer-term reliability and clean energy objectives.¹⁰ The effectiveness of both frameworks will depend not only on timely procurement of new resources, but also on the continued retention of existing resources needed to maintain reliability during the transition period.

The CAISO supports the Ruling's recognition of the complementary roles of the RA program and the RCPPP. The Commission should consider whether the proposed RCPPP framework adequately addresses the continued role of existing resources in maintaining reliability while replacement resources are developed and brought online. Ensuring reliability during the transition to an increasingly clean resource mix will require not only timely procurement of new resources, but also the retention of existing resources that continue to provide reliability value.

The importance of resource retention is reflected in the planning assumptions that support the Commission's IRP process. The preferred system plan and associated portfolios transmitted to the CAISO for transmission planning generally assume that a large majority of the existing thermal fleet remains available through 2045 to help meet reliability needs at least cost and support system operations as California transitions to a predominantly clean energy resource

prior to the issuance of the next comprehensive transmission plan, the CAISO will present such upgrades and/or additions to the CAISO Board of Governors for approval.

¹⁰ *Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*, p. 4.

mix.¹¹ These planning assumptions recognize the ongoing reliability contributions of existing thermal resources as the State continues to develop and integrate new resources. Moreover, planning assumptions generally assume that the existing fleet will largely stay online and serve California load for the entire planning horizon. Retaining these resources is critical to maintaining reliability and meeting the State's energy goals.

Maintaining reliability depends not only on successful procurement of new resources through the RCPPP, but also on the continued availability of certain existing resources until comparable reliability services can be provided by replacement resources. As the existing resource fleet, and in particular thermal resources located in local capacity areas, near retirement age or its initial contracts expire, the CAISO believes there is a need to examine more closely how to manage the future transition.

The Commission should therefore ensure that the interaction between the RCPPP and the RA program provides sufficient investment and retention signals for resources that continue to provide reliability value. Resources that are unable to satisfy the objectives of multiple procurement programs simultaneously may face increased retirement risk even where they remain necessary to support the reliability assumptions reflected in the IRP portfolios. If resources retire earlier than assumed in the Commission's long-term planning studies, planning assumptions may diverge from realized resource availability. This could increase reliability risks, reduce operational flexibility, and require additional procurement or transmission solutions to address evolving reliability needs, with the associated costs borne by ratepayers.

While the RCPPP is primarily focused on facilitating investment in new resources, the RA program remains the primary mechanism for ensuring sufficient resources are available to maintain reliability in the operational timeframe. The RA program should therefore ensure sufficient resources are procured to meet reliability needs through an adopted planning reserve margin that reflects a 0.1 LOLE reliability standard. Such requirements are critical for providing incentives for retaining existing resources that remain necessary to support system reliability.

In conclusion, the Commission should evaluate whether the combined requirements of the RA program and RCPPP provide appropriate and complementary signals to support both the

¹¹ California Public Utilities Commission 2024-2026 IRP Inputs & Assumptions Report, p. 27. https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan/2024-2026-irp-cycle-events-and-materials/2025_inputs_and_assumptions_report_20260210.pdf

development of new resources *and* the continued availability of existing resources assumed in the IRP portfolios and needed to maintain reliability throughout the transition to an evolving resource mix.

Question 21: Please comment on anything else that is not already covered in the list above.

Baseline Development

The Ruling Proposal maintains the same baseline generator list of resources (baseline or procurement compliance baseline) used to determine eligibility in prior mid-term reliability procurement orders, requiring all procurement obligations under the proposed RCPPP option to be incremental to the existing baseline.¹² Under the proposal, resources that come online after January 1, 2020, may be used to satisfy a procurement obligation, provided they have not previously been counted toward compliance with another procurement requirement. In addition, LSEs with a surplus of eligible resources may use those resources toward compliance with future procurement obligations. The CAISO supports continuing to use the same baseline for determining incrementality, noting that it has been thoroughly analyzed and refined in the IRP proceeding. Maintaining an accurate modeling baseline is essential to ensuring that the Commission's TPP portfolios and the need determination used to set procurement requirements appropriately reflect actual reliability needs. The modeling baseline serves as the basis for determining the type, timing, and amount of resource need. Therefore, the modeling baseline should be clear, accurate, and easily cross-walked with the RCPPP procurement compliance baseline to ensure any identified procurement need accounts for newly operational resources and their use in compliance demonstrations.

An accurate baseline is also important for avoiding incentives for under-procurement and over-procurement. Under-procurement of resources poses significant reliability risks. Over-procurement of new resources can create unnecessary cost burdens and may inadvertently accelerate the retirement of existing resources that continue to provide reliability benefits. This concern is particularly relevant where new resources may receive greater compliance value across multiple programs than existing resources. Consequently, IRP resource portfolio

¹² *Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*, p. 12.

development assumptions, including the modeling baseline, need to accurately reflect new resource development and retirements.

The CAISO also supports further consideration of the impacts of repowering existing resources included in the procurement compliance baseline as part of the RCPPP development and implementation process. This evaluation may warrant establishing a mechanism to update the procurement compliance baseline to allow repowered resources to retain a pathway to receive procurement compliance value in the future. In addition, the CAISO recommends continued monitoring of resource retirements and periodic assessment of the reliability impacts associated with near-term retirements when evaluating the modeling baseline. This will help ensure the need determination in RCPPP captures the retirement of these resources and the potential supply shortfall their exit may create.

Ultimately, maintaining an accurate procurement compliance baseline is critical to ensuring procurement requirements are appropriately calibrated to reliability needs and do not unintentionally drive under-procurement, over-procurement, or premature retirements of existing resources.

Allowances for Energy Only Resources

The Proposal does not explicitly identify whether energy only (EO) resources would be eligible to count toward meeting procurement obligations under the RCPPP. However, in the July 2026 decision in Track 1 of the RA proceeding, the Commission allowed co-located EO resources to count for charging sufficiency of offsite storage resources in hours when the co-located storage is not shown, provided that co-located storage is deliverable.¹³ The final decision ordering 2029-2032 resource procurement in the IRP proceeding similarly allowed EO resources co-located with storage that come online after the decision to count towards the 2029-2032 procurement order.¹⁴ The CAISO strongly recommends deferring eligibility for co-located EO resources to count towards meeting procurement obligations under RCPPP until the completion of the CAISO's 2026-2027 TPP Reliability Assessment study of the baseline scenario for the summer off-peak base cases. The CAISO also recommends that any allowance for EO resource eligibility under the RCPPP framework be contingent on the results of CAISO's TPP Reliability Assessment.

¹³ Decision (D.) 26-07-008, pp.187-188.

¹⁴ D. 26-02-57, p. 144.

A key purpose of the RCPMP framework is to direct procurement toward resources needed to meet grid reliability needs. While IRP portfolios such as the recent 2026-2027 TPP portfolio include significant amounts of new EO resources in the long-term,¹⁵ allowing EO resources to count toward future RCPMP procurement obligations before the CAISO is able to demonstrate their ability to reliably deliver energy to storage resources could result in the procurement of undeliverable resources. If EO resources are unable to deliver energy to sufficiently charge storage resources during peak conditions, this may result in system reliability shortfalls.

The CAISO expects preliminary results from the 2026-2027 TPP Reliability Assessment in November 2026. The results will be included in the Transmission Plan scheduled for approval by the CAISO Board of Governors in May 2027.

III. Conclusion

The CAISO appreciates the opportunity to provide opening comments on the Ruling.

Respectfully submitted,

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¹⁵ Resource-to-Busbar Mapping & Other Modeling Assumptions for the 2026-2027 Transmission Planning Process, CPUC Staff Report, p.15. https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan/2024-2026-irp-cycle-events-and-materials/assumptions-for-the-2026-2027-tpp/busbar-mapping-report_decision.pdf