

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator
Corporation

Docket No. EL26-71-000

Citizen S-Line Transmission LLC
Citizens Sunrise Transmission LLC
Citizens Sycamore-Penasquitos Transmission LLC
City of Anaheim, California
City of Azusa, California
City of Banning, California
City of Colton, California
City of Pasadena, California
City of Riverside, California
DCR Transmission, L.L.C.
DesertLink, LLC
GridLiance West LLC
Horizon West Transmission, LLC
LS Power Grid California, LLC
Morongo Transmission LLC
Pacific Gas and Electric Company
San Diego Gas & Electric Company
Southern California Edison Company
Startrans IO, L.L.C.
SunZia Transmission, LLC
Trans Bay Cable LLC
Valley Electric Association, Inc.
Viridon Path 15, LLC
Western Area Power Administration

MOTION FOR ABEYANCE

Pursuant to Rule 212 of the Rules of Practice and Procedure of the
Federal Energy Regulatory Commission, the California Independent System
Operator Corporation (CAISO) respectfully submits this motion to hold the instant
proceeding in abeyance for 90 days from the deadline to respond, *i.e.*, until

November 16, 2026.¹ As detailed below, this abeyance period will provide the CAISO sufficient time to work with stakeholders to develop all policies necessary to address the Commission's preliminary findings in the Order to Show Cause on the justness and reasonableness of the CAISO tariff concerning large loads, and to submit a filing to the Commission under Section 205 of the Federal Power Act (FPA).² The abeyance period also will align with CAISO Participating Transmission Owners' requests, such that the CAISO and its Participating Transmission Owners will be able to submit all relevant Section 205 filings to address the findings of the Commission in the Order to Show Cause by November 16, 2026. The CAISO appreciates the Commission's recognition of the unique regional differences present in California in the Order to Show Cause. Providing time for the CAISO and its Participating Transmission Owners to develop these filings will allow for tailored solutions that reflect these regional nuances and will avoid disrupting existing commercial arrangements, as the Order to Show Cause requires.³ The CAISO believes that granting this motion for abeyance will enable the CAISO and its Participating Transmission Owners to satisfy the Order to Show Cause, remove the need for further action under FPA Section 206, and rather than causing any harm to interested parties, will expedite the overall conclusion of the proceeding and the implementation of the reforms envisioned by the Commission in the Order to Show Cause.

¹ 18 C.F.R. § 385.212. Capitalized terms not otherwise defined herein have the meanings set forth in Appendix A to the CAISO tariff.

² *California Independent System Operator Corp.*, 195 FERC ¶ 61,214 at P 35 (2026) (Order to Show Cause).

³ *Id.* at P 34.

I. Background

In the Order to Show Cause, the Commission identified a series of complex issues related to integrating large loads onto the transmission system. While the CAISO has prepared for and reliably served concentrated growth in large loads to date, it also understands the need to evolve policies and processes to enable the accelerated additions of large loads and the additional complexity that they may introduce. The CAISO has identified similar issues to the Commission over the past few months regarding changing system needs related to new large loads. In response, the CAISO has convened several stakeholder processes to enhance large load processes, resource adequacy rules, demand-side market participation, and generator interconnection processes. As explained further below, the CAISO's Large Load stakeholder initiative will become the vehicle for CAISO reforms to address the Order to Show Cause, which the CAISO was planning to file pursuant to FPA Section 205 when the stakeholder processes concluded.

The Commission's Order to Show Cause contemplated that the CAISO might prefer to address the issues raised in the Order through a Section 205 filing, and suggested that if the CAISO wished to have the Commission hold the Section 206 proceeding in abeyance, it should file an appropriate motion for abeyance in this docket. The Commission emphasized that it would not grant such abeyances reflexively, that any abeyance will be limited to 90 days, and that

it would look with great disfavor toward requests to extend the abeyance period.⁴ The Commission anticipated that successful abeyance requests will include both (1) a robust description of the content of a potential future filing under FPA Section 205, and (2) a reasoned and specific explanation of when such a filing is expected to be made.

II. Request for Abeyance

The CAISO files this motion for abeyance in accordance with the Commission's direction in the Order to Show Cause and in recognition of the progress to date and planned future progress toward a Section 205 filing, together with the CAISO Participating Transmission Owners, that will address the preliminary findings in the Order to Show Cause. The CAISO respectfully requests that the Commission hold the Section 206 proceeding initiated with the Order to Show Cause in abeyance for 90 days while the CAISO and its Participating Transmission Owners develop their respective Section 205 filings to address Commission's preliminary findings.

The CAISO describes below the content of a potential future filing under FPA Section 205, with the level of detail currently available given the stage of the Large Load stakeholder initiative, and the explanation of the timeline for an anticipated Section 205 filing. The CAISO also includes a description of coordination with its Participating Transmission Owners, which, as the

⁴ *Id.* at P 35.

Commission recognized in the Order to Show Cause, have a unique role in the large load interconnection process in California.

a. Description of Content of Potential Future Filing Under FPA Section 205

By the end of the abeyance period, the CAISO expects to submit an FPA Section 205 filing that, with simultaneous Section 205 filings from the Participating Transmission Owners, will address all the preliminary findings and five categories of reforms set forth in the Order to Show Cause, as appropriate for the CAISO region. The CAISO expects that the vast majority of its tariff revisions will be able to become effective as soon as approved by the Commission.⁵ Submitting such a Section 205 filing will require an expedited stakeholder process to develop, vet, and receive approval for the policy changes; however, a public stakeholder process will ensure policy changes are specifically tailored to the regional needs and State policies of California.

The CAISO's ongoing Large Load stakeholder initiative will become the vehicle for CAISO reforms to address the Order to Show Cause. The CAISO recognizes the importance of clarity on roles in planning for large loads and launched the Large Loads stakeholder initiative last year. Within the initiative, the CAISO posted an issue paper in January 2026 outlining roles, responsibilities, and processes to effectively integrate large loads. In addition, the CAISO posted

⁵ Although it is too early to know for sure, the only likely exceptions could be those changes that require significant software enhancements, such as new settlement charges; however, the CAISO will expedite any software development to deploy as soon as possible.

a straw proposal in June 2026 describing possible technical requirements associated with large loads.

These initial documents are well-aligned with the five categories FERC identified. For example, the issue paper specifically discusses the current treatment of large load interconnection within the CAISO, provisions for co-location of generation and large loads, transmission service offerings, cost allocation and responsibility, technical requirements and standards, and operational requirements. The straw proposal takes the next step with regard to many of the technical requirements discussed in the Order to Show Cause, and the CAISO is actively working on a straw proposal to address other issues identified in the Large Loads stakeholder initiative and the Order to Show Cause.

In addition, the CAISO has had numerous discussions with the State regulators that oversee retail rate design in California to ensure there is sufficient transparency. The Commission highlights in the Order to Show Cause the need to allow state regulators to effectively perform their role in protecting consumers from cost shifts. As described in comments to the Commission's Advanced Notice of Proposed Rulemaking, California policymakers and utilities already did considerable work to ensure long-term forecasting, procurement, and planning accounted for large load growth.⁶ The California Public Utilities Commission and Pacific Gas and Electric Company have likewise been working to create a tariff

⁶ See, e.g., *Interconnection of Large Loads to the Interstate Transmission System*, Comments of Pacific Gas and Electric Co. (Nov. 21, 2025), Comments of California Public Utilities Commission (Nov. 21, 2025), Docket No. RM26-4-000.

specifically tailored to high-voltage interconnections of large loads that aligns costs with benefits for all ratepayer classes.⁷

The CAISO also is closely coordinating with its Participating Transmission Owners, to ensure the matters within their purview that the Commission raises in the Order to Show Cause also will be part of the future Section 205 filings. To be certain, this coordination began before the Order to Show Cause as the framework for integrating large loads in California includes significant tariff provisions in the Participating Transmission Owners' tariffs and the CAISO's tariff.

b. Explanation of When a Section 205 Filing is Expected

The CAISO will refocus the Large Loads initiative on the issues the Commission has identified in the Order to Show Cause. Given the timeline described in the Order to Show Cause and the Commission's clear prioritization of addressing issues around integrating large loads onto the transmission system, the CAISO expects to expedite the stakeholder initiative, with two discrete proposals: a straw proposal in August and draft final proposal in September, before seeking Western Energy Market Governing Body and Board of Governors approval as necessary at the October 20 and October 28 meetings, respectively.⁸ Although the stakeholder initiative will be expedited, the CAISO will host workshops and solicit stakeholder feedback on the proposals to better

⁷ *Id.*

⁸ Decisional classifications will become clearer as the proposals within the Large Loads stakeholder initiative develop.

inform the policy outcomes.⁹ The CAISO has already notified stakeholders of the expedited Large Loads initiative schedule and included the schedule in its 30-day filing regarding resource adequacy filed publicly in this docket on July 20, 2026:

Action	Date
Post Straw Proposal	August 12, 2026
Stakeholder workshop	August 19, 2026
Comments due	September 2, 2026
Post Draft Final Proposal	September 21, 2026
Stakeholder workshop	September 28, 2026
Comments due	October 12, 2026
Western Energy Market Governing Body (if necessary)	October 20, 2026
CAISO Board of Governors	October 28, 2026
FERC Filing on Order to Show Cause	November 16, 2026

Rather than causing any harm to interested parties, holding the Section 206 proceeding in abeyance will enable the CAISO to work with its stakeholders as part of the Large Loads stakeholder initiative that it has already begun—and which interested parties have already begun to participate—and will resolve the issues the Commission identifies in a more expeditious manner than proceeding with a response to the Order to Show Cause and traditional processing of the Section 206 proceeding.

c. Coordination with Participating Transmission Owners

The Order to Show Cause recognizes “the framework under which CAISO provides transmission service is unique among the RTOs/ISOs and that certain responsibilities fall to the Participating Transmission Owners.”¹⁰ The Order to Show Cause further states that the Commission appreciates that the CAISO and

⁹ This timeline assumes the Commission grants this motion for abeyance for 90 days, as contemplated by the Order to Show Cause at P 25.

¹⁰ Order to Show Cause at P 37.

Participating Transmission Owner responsibilities may stem from how the CAISO and the Participating Transmission Owners allocated rights and responsibilities in the governing documents establishing the CAISO.¹¹ While the Commission “do[es] not seek to alter that allocation of rights and responsibilities,”¹² it “expect[s] that CAISO and the Participating Transmission Owners will coordinate with each other, as appropriate, to develop responses.”¹³

The CAISO values these directions from the Commission. The CAISO and its Participating Transmission Owners coordinated on large load interconnections before the Order to Show Cause, and have coordinated strongly since, including multiple weekly meetings among various teams of subject-matter experts for the categories of issues identified by the Commission. By being able to maintain the current allocation of responsibilities between the CAISO and Participating Transmission Owners, Californian stakeholders will not have to start anew, enabling the CAISO and Participating Transmission Owners to coordinate on addressing all the issues identified in the Order to Show Cause by the end of the abeyance period. This coordination should enable rapid and smooth implementation of the policies necessary to address the Order to Show Cause.

¹¹ *Id.* at P 51.

¹² *Id.*

¹³ *Id.* at P 37.

III. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion for abeyance in this proceeding.

Respectfully submitted,

/s/ William H. Weaver

Roger E. Collanton

General Counsel

William H. Weaver

Assistant General Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

(916) 608-7135

bweaver@caiso.com

Counsel for the California Independent System Operator Corporation

Dated: August 3, 2026

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA this 3rd day of August, 2026.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO