



## California Wind Energy Association

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May 14, 2026

CAISO Board of Governors  
California Independent System Operator  
250 Outcropping Way  
Folsom CA 95630

*Transmitted electronically*

Re: Improper treatment of in-state wind in the 2025-26 Transmission Plan

Dear Chair Eto, Vice Chair Leslie, and Board Members,

Earlier this week, the California Wind Energy Association (CalWEA) copied you on a letter to President Mainzer (attached) expressing our concern regarding staff's apparently unilateral decision not to treat in-state wind as a "long lead-time" resource for which transmission deliverability capacity should be reserved. This decision was contrary to the CPUC's request to include certain in-state wind resources in its Decision 25-02-026, intended to inform the 2025-26 Transmission Plan.

CAISO's January 30, 2025, comments on the CPUC's Proposed Decision, leading up to its adopted decision, stated that CAISO "supports and appreciates the Proposed Decision's direction that the CAISO reserve transmission plan deliverability (TPD) for long lead-time (LLT) resources," which included certain in-state wind resources. And yet, these resources are excluded for deliverability reservation in the draft 2025-26 Transmission Plan (see Table 1-1).

This omission must be corrected if California is to achieve its planning goals for wind energy, which fits the criteria established by CAISO's "long lead time" policy. Moreover, for the 2026-27 Transmission Plan, CAISO should engage in a more transparent discussion of its policy, which provides considerable deference to Local Regulatory Authorities such as the CPUC.

CalWEA appreciates your attention to this matter.

Sincerely,

Nancy Rader  
Executive Director  
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510-919-6358



# California Wind Energy Association

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May 11, 2026

Elliot Mainzer  
President and Chief Executive Officer  
California Independent System Operator  
250 Outcropping Way  
Folsom CA 95630

*Transmitted electronically*

Re: 2025-26 Transmission Plan & CAISO's Non-Transparent Policy on "Long Lead Time" Resources

Dear President Mainzer,

A provision in the draft 2025-26 Transmission Plan, if adopted, would seriously impede California wind development. The draft plan categorically excludes in-state wind resources from CAISO's new policy of reserving transmission deliverability capacity for "long lead time" (LLT) resources. This provision must be corrected if California is to achieve its planning goals regarding these resources.

Staff proposes to confer LLT status on out-of-state wind and in-state geothermal resources without ever explaining why these resources deserve LLT treatment while in-state wind resources do not. Staff's decision is also at odds with its own March 3, 2025, IPE Track 3 Updated Final Proposal on the matter.

In the March 3, 2025, document, CAISO staff described the policy as "clear and transparent." CalWEA thought so too, presuming that CAISO would be responsive to the CPUC's February 2025 IRP Decision requesting that CAISO reserve capacity for in-state wind energy resources, among others. Thus, we were surprised when staff proposed excluding in-state wind in the present Transmission Plan. When CalWEA asked for an explanation on CAISO's November 19, 2025, stakeholder call, none was provided, but comments were encouraged. On December 5, 2025, CalWEA provided detailed comments that were never responded to.

CAISO's policy on LLT resources includes numerous references to Local Regulatory Agency input, as well as other references that would support the inclusion of in-state wind. The section appears to give the CPUC, as an LRA, substantial input, if not complete deference, regarding which specific resources qualify as LLT, and nothing suggests that the policy should preclude in-state wind.

Unfortunately, in its 2026 IRP decision, the CPUC defers (inappropriately, in our view) to CAISO's initial implementation of the policy, stating that CAISO did not deem in-state wind to have a long lead time "because its development timeline is similar to other resources and there are already numerous projects in the interconnection queue." Neither of these statements is true, and, in any case, CAISO did not include "number of projects in the queue" as a criterion for conferring LLT status on a resource. CAISO's policy states that LLT resources must be:

- a "long lead-time resource technology" – in-state wind resources use the same technology as out-of-state wind;
- "location-constrained" – in-state wind resources are highly location-constrained; and
- "dependent on policy-approved transmission with explicit guidance to treat the resource as a long lead-time resource from the CPUC" – the CPUC provided such guidance in its February 2025 decision.

The CAISO staff's decision to unilaterally deem in-state wind not an LLT resource contradicts its own policy and was not "clear and transparent" as it described its policy.

In-state wind is no different from out-of-state wind or in-state geothermal in its dependence on transmission deliverability capacity reservation, given the much shorter development lead times and greater siting flexibility of solar and battery resources. The staff's decision will have devastating consequences on the ability to develop in-state wind resources and, thus, to achieve the in-state wind resources included in the CPUC's portfolio.

Therefore, we request that this aspect of the 2025-2026 decision be corrected. We would welcome the opportunity to discuss this matter with you.

Sincerely,



Nancy Rader  
Executive Director  
[nrader@calwea.org](mailto:nrader@calwea.org)  
510-919-6358

cc: CAISO Chair Joe Eto  
CAISO Vice Chair Mary Leslie  
Members of the CAISO Board  
CPUC President John Reynolds

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