San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

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May 13, 2026

Chair Joe Eto
Vice Chair Mary Leslie
Governor Alice Reynolds
Governor Severin Borenstein
Governor Jan Schori

California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

RE: CCSF Comments on the 2025–2026 Draft Transmission Plan and the Future of the Warnerville–Newark Transmission Expansion Project (WaNTEP)

Dear Chair Eto and Governors,

The City and County of San Francisco (the "City") appreciates the opportunity to provide comments on the California Independent System Operator's ("CAISO") 2025–2026 Draft Transmission Plan. CAISO's recent transmission plans reflect the scale of investment required to meet rapidly increasing load, evolving resource portfolios, and the State's long-term policy objectives. In this context, the City seeks to highlight the distinctive attributes of the Warnerville–Newark Transmission Expansion Project ("WaNTEP") and to express its eagerness to work collaboratively with CAISO to explore pathways for advancing the project.

WaNTEP offers a rare opportunity to deliver substantial incremental transmission capability using an existing City-owned right-of-way connecting the City-owned Warnerville Substation to PG&E's Newark Substation. The existing transmission assets in this corridor are aged and the City, when considering appropriate next steps, heard the CAISO call for making the best use of existing transmission corridors. By rebuilding and upgrading infrastructure within an established corridor, WaNTEP faces significantly fewer permitting, right-of-way acquisition, and siting challenges than many greenfield alternatives. These attributes materially reduce development risk, schedule uncertainty, and cost escalation considerations that are becoming increasingly important as transmission project portfolios grow in size and complexity. By reinforcing the Warnerville–Newark corridor, WaNTEP would expand the Greater Bay Area's ability to interconnect and deliver renewable generation from diverse geographic areas, including resources that are otherwise constrained by limited import capability.

Recognizing CAISO's responsibility to balance near-term needs with long-term planning discipline, the City is willing to coordinate with CAISO under FERC's 2021 policy framework and other established pathways to further evaluate WaNTEP. Such coordination could include technical, financial, and sequencing work conducted both within and outside the formal Transmission Planning Process cycle**,** consistent with CAISO precedent and FERC guidance encouraging voluntary, right-sized transmission solutions that deliver demonstrable ratepayer benefits.

As documented in the City's attached comments (Attachment 1), WaNTEP was conceived as a 230 kV corridor-level reinforcement intended to preserve transfer capability, provide long-term optionality, and complement other transmission projects, not as a substitute for all downstream 115 kV network upgrades in the Greater Bay Area. WaNTEP delivers measurable reliability benefits, mitigates multiple contingency overloads across planning horizons, and enables more efficient sequencing and right-sizing of downstream investments as system needs evolve.

In addition, WaNTEP presents meaningful cost-containment and financing advantages. As a publicly sponsored project, WaNTEP can access low-cost public financing and alternative ownership structures that reduce long-run transmission revenue requirements for CAISO ratepayers. WaNTEP also creates the opportunity for the City to become a Participating Transmission Owner ("PTO"), aligning public ownership with CAISO operational control and leveraging the City's tax-exempt cost-of-capital advantage for the benefit of the broader system.

The City also respectfully notes that projects offering long-term optionality, constructability advantages, and policy value should not be discounted solely because they are not optimized to address a narrow set of near-term contingencies or because they do not conform to traditional ownership or development models. As CAISO's system and planning objectives evolve, preserving flexible, scalable transmission pathways within existing corridors will be increasingly important to managing risk, cost, and uncertainty for ratepayers.

The City respectfully requests that the CAISO Board:

1. **Acknowledge WaNTEP's unique constructability, timing, and financing advantages** as a transmission solution that leverages existing infrastructure while preserving long-term optionality for the Greater Bay Area; and
2. **Support CAISO staff's continued coordinated engagement with the City** to evaluate potential pathways for advancing WaNTEP, including structures contemplated under FERC 2021 and other CAISO precedents.

The City views WaNTEP as a collaborative opportunity: a project that can be shaped jointly to support CAISO's reliability and policy objectives while managing risk and protecting ratepayers. This project is a generational opportunity for both the City and the CAISO. We appreciate the Board's consideration and look forward to continued engagement.

Sincerely,

Barbara Hale
Assistant General Manager, Power
City and County of San Francisco

Attachments:
Attachment 1: Hetch Hetchy Water and Power Comments on the CAISO 2025–2026 Draft Transmission Plan

cc:
Elliot Mainzer, President and Chief Executive Officer, CAISO
Mark Rothleder, Senior Vice President and Chief Operating Officer, CAISO
Neil Millar, Vice President, Transmission Planning and Infrastructure Development, CAISO
Jeff Billinton, Director, Transmission Infrastructure Planning, CAISO
Binaya Shrestha, Manager-North, Transmission Infrastructure Planning, CAISO

Attachment 1: Hetch Hetchy Water and Power Comments on the CAISO Draft 2025-2026 Transmission Plan

Submit comment on Draft 2025-2026 Transmission Plan

2025-2026 Transmission planning process

1. Please provide your organization's comments on Reliability-driven Projects Recommended for Approval.

The City and County of San Francisco (the "City") appreciates the opportunity to comment on the CAISO's 2025-2026 Draft Transmission Plan ("Draft Plan") posted on April 7, 2026, and the material presented at the CAISO Stakeholder meeting on April 15, 2026. The City's comments are primarily focused on CAISO's evaluation of the Warnerville–Newark Transmission Expansion Project (WaNTEP).

I. **CAISO Recognition of the Potential Benefits of Upgrading the Warnerville–Newark Path**

The City appreciates CAISO's acknowledgment in the Draft Plan that upgrading the existing Warnerville–Newark transmission path may provide meaningful system benefits. The Draft Plan states that the CAISO recognizes the potential benefits of upgrading the Warnerville–Newark path to a higher capacity and notes that such upgrades could strengthen the 230 kV network at Newark and potentially enable additional renewable resource integration in the Newark–Warnerville area. The Draft Plan further recognizes that, while such capabilities are not required in the current planning cycle, steadily increasing load growth in the Greater Bay Area suggests that additional capacity may be required in future planning cycles.[1]

CAISO's acknowledgment of the potential benefits of upgrading the Warnerville–Newark path is consistent with the City's prior comments submitted during the Preliminary Reliability Assessment.[2] As demonstrated in those comments, multiple WaNTEP configurations eliminate or materially reduce P1, P6, and P7 contingency overloads on critical 230 kV facilities serving the Greater Bay Area in both the 2035 and 2040 study horizons, confirming that this corridor functions as a structural reinforcement that preserves long-term transfer capability.

II. **WaNTEP and the Tesla–Trimble–Metcalf Project Were Not Evaluated on an Equivalent Basis**

The City is concerned that evaluating only a narrow subset of potential WaNTEP configurations biases the comparison toward projects optimized to address near-term overload relief, rather than alternatives that provide corridor-level reinforcement and long-term system optionality. As a result, the Draft Plan does

not reflect a like-for-like assessment of solutions intended to meet different planning objectives.
While the City recognizes CAISO's obligation to identify near-term reliability solutions, the City respectfully disagrees with the conclusion that WaNTEP is not a viable alternative when compared to the Tesla–Trimble–Metcalf 230 kV Corridor Expansion. Appendix B of the Draft Plan describes how WaNTEP was considered as an alternative; however, CAISO evaluated only a limited subset of WaNTEP configurations and did not assess the full range of configurations previously provided by the City. In particular, the analysis appears to have focused on a single 1,000 MW HVDC injection from Tesla to Newark and a single 230 kV AC configuration, rather than the broader set of WaNTEP configurations developed to address longer-term system needs and optionality.[3] In addition, CAISO did not consider the potential to address the near-term overload issues downstream of the Newark substation in conjunction with WaNTEP to address both near-term and longer-term objectives as described in Section 1.III.

The Draft Plan Appendix B, Table B.3-19 identifies the unresolved overloads associated with the Tesla–Newark alternatives. The City's assessment uses CAISO's final 2035 and 2040 GBA summer peak cases, applying the same P1 and P7 contingency definitions, with only project-specific topology changes necessary to reflect the Tesla–Trimble–Metcalf and WaNTEP configurations. Our assessment indicates that four (4) of the eleven (11) listed unresolved overloads also appear as overloaded under P1 or P7 contingencies, even with the Tesla–Trimble–Metcalf Project. In addition, three (3) facilities identified in Table B.3-19 do not show overloads under either normal or contingency conditions under any WaNTEP configurations.

Table 1 in the Appendix below summarizes the P1 and P7 facility-and-contingency combinations that remain unmitigated with the Tesla–Trimble–Metcalf Project. Table 2 documents the unresolved overloads referenced in Table B.3-19 that were not observed in the City's power flow assessment. Table 3 shows that WaNTEP mitigates several P1 and P7 overloads across both the 115 kV and 230 kV systems, indicating that the project delivers incremental reliability improvements beyond those acknowledged in the CAISO's documentation.

III. WaNTEP Was Not Designed to Resolve Downstream 115 kV Overloads

CAISO's evaluation observes that the studied WaNTEP configurations were not effective in addressing the identified overloads in the 115 kV grid downstream of the Newark substation.[4] The City believes this criticism conflates distinct planning objectives. WaNTEP was designed as a 230 kV system reinforcement to improve transfer capability and preserve optionality between Warnerville/Tesla and Newark; it was not intended to resolve all 115 kV network constraints downstream of Newark. Had CAISO studied WaNTEP in conjunction with similar downstream upgrades as those presumably addressed by the Tesla – Trimble – Metcalf Project, CAISO likely would find that the WaNTEP addresses both the near-term problems solved by Tesla – Trimble – Metcalf, while also addressing overloads on the 230 kV paths connecting to Newark, as noted in Appendix B of the Draft Plan.[5]

The City's prior analysis shows that, while WaNTEP was not designed as a substitute for all downstream 115 kV reinforcements, its configurations nevertheless reduce loading and eliminate certain contingency overloads on key 115 kV facilities connected to Newark and multiple bay area 230kV import

facilities. These effects allow CAISO to defer, right-size, or sequence downstream upgrades more efficiently, rather than committing prematurely to extensive local reinforcements.[6]

IV. CAISO's Cost Characterization of WaNTEP Overstates Its Incremental Cost

The City is concerned that CAISO's characterization of WaNTEP as costing approximately $1.6–$2.1 billion is misleading. First, the $1.6–$2.1 billion capital cost estimates were for the HVDC line and converter station associated with the Tesla-Newark DC option, and not for the lower cost AC WaNTEP configuration. Further, the costs also include the cost of several mitigations for facility overloads that are presumably unresolved by the Tesla-Newark HVDC option. Assigning the costs of unrelated downstream reinforcements to WaNTEP, without assigning similar costs to Tesla-Trimble-Metcalf and without crediting WaNTEP for resolving overloads on additional facilities, results in an inflated comparison with the Tesla–Trimble–Metcalf Project. The City is conducting additional power flow analysis to create a like-for-like comparison of the projects and will share its results with CAISO.

The City urges CAISO to remove the $50–$100 million cost of the Newark–NRS 230 kV line upgrade from the WaNTEP cost estimates. As shown in Table 2, several of the unresolved overloads referenced in the Draft Plan Appendix B, Table B.3-19 were not observed in the City's power flow assessment; therefore, any associated mitigation costs included in the WaNTEP estimate should be removed from Appendix B.

For a fair cost comparison between the proposed Tesla–Trimble–Metcalf Project and WaNTEP, the City also urges CAISO to also allocate the cost of the unmitigated overloads listed in Table 1 of the appendix below to the Tesla–Trimble–Metcalf Project, which CAISO has already allocated to WaNTEP. Specifically, CAISO should include the facility costs for the following upgrades:

- $63–$126 million for the Hicks–Monta Vista 230 kV upgrade
- $60–$120 million for the Newark 230/115 kV transformer bank upgrade
- $50–$100 million for the Lone Tree–Cayetano 230 kV line upgrade

If the CAISO chooses to allocate the cost of $173–$346 million attributed to these upgrades to WaNTEP, then it should likewise add them to the Tesla–Trimble–Metcalf Project, as several P1 and P7 overloads remain unmitigated under that project.

V. Capital Cost Alone Is Not an Appropriate Basis for Comparison

The City emphasizes that this deferral and sequencing value represents a material ratepayer benefit that is not captured by gross capital cost comparisons alone, particularly when contrasted with extensive reconductoring or greenfield alternatives that carry greater delivery, permitting, and environmental risk.

The City further notes that comparing transmission alternatives solely on gross capital cost does not fully reflect their impact on CAISO ratepayers. Alternative ownership and financing structures, including full or partial public financing, result in significantly lower net ratepayer costs even where headline capital costs appear comparable. Accordingly, the City encourages CAISO to consider financing

structure, cost recovery mechanisms, and long-term optionality, in addition to capital cost, when evaluating competing transmission solutions.

The City's evaluation demonstrates that WaNTEP provides additional system-level reliability benefits that are unresolved by the Tesla-Trimble-Metcalf Project, and are not identified in the Draft Plan Appendix B. As shown in Table 3 in the Appendix below, WaNTEP mitigates several P1 and P7 overloads across both the 115 kV and 230 kV systems, indicating that the project delivers incremental reliability improvements beyond those acknowledged in the CAISO's documentation. These findings demonstrate that WaNTEP offers additional reliability benefits should the CAISO Board approve the Tesla-Trimble-Metcalf Project under the 2025-2026 Transmission Plan.

VI. Compressed Comment Timeline

The Draft Plan provides stakeholders with approximately two weeks to submit comments on several projects that have not been previously discussed in this cycle. This compressed timeline significantly limits the City's ability to conduct a meaningful review or perform the level of impact analysis necessary to provide informed, technically grounded feedback. Additional time would materially improve the quality and usefulness of stakeholder input, particularly for newly introduced or substantially revised projects.

VII. The City is Eager and Willing to Coordinate with CAISO Under FERC 2021 and Other Pathways for WaNTEP

The CAISO recognizes the potential benefits of upgrading the existing Warnerville-Newark transmission path to a higher capacity and has indicated an interest in working with Hetch Hetchy Water and Power on projects of mutual interest for the betterment of both CAISO and City's systems.[7] The City reiterates its willingness to coordinate with CAISO regarding Hetch Hetchy Water and Power's capital maintenance plans and to explore whether a coordinated, right-sized upgrade of the Warnerville–Newark corridor could be viable. Such coordination would be consistent with the Federal Energy Regulatory Commission's 2021 policy encouraging voluntary agreements to plan and pay for transmission facilities that preserve optionality and provide long-term ratepayer benefits. The City looks forward to continued engagement with CAISO, both within and outside of future planning cycles, to further evaluate Greater Bay Area transmission needs.

Appendix: 2035 & 2040 Summer Peak Reliability Assessment Results Tables

Table 1: *P1&P7 Facility Overload and Contingency Combinations not mitigated with Tesla-Trimble-Metcalf in 2035 & 2040 GBA Summer Peak models*

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla - Trimble - Metcalf
LONETREE-CAYETANO 230KV LINE	P7	Tesla-Newark 2 and Tesla F-Trimble 230 kV Lines (new Trimble) (Pst SCD mods)	400	<99%	<99%	**107%**	**101%**
MONTAVIS-HICKS 230kV LINE	P7	Metcalf-Monta Vista No. 3 and Monta Vista-MEC(Coyote SS) 230kV Lines (Pst SCD mods)	478	**122%**	**109%**	**130%**	**116%**
	P7	Metcalf-Monta Vista No. 3 and MEC(Coyote SS)-Metcalf 230kV Lines (Pst SCD mods)		<99%	<99%	**128%**	**113%**
	P1	Metcalf-Monta Vista No. 3 and Monta Vista-MEC(Coyote SS) 230kV Lines (Pst SCD mods)		<99%	<99%	**115%**	**100%**
METCALF D-HICKS 230kV LINE	P7	Metcalf-Monta Vista No. 3 and Monta Vista-MEC(Coyote SS) 230kV Lines (Pst SCD mods)	637	**118%**	**108%**	**128%**	**117%**
	P7	Metcalf-Monta Vista No. 3 and MEC(Coyote SS)-Metcalf 230kV Lines (Pst SCD mods)		<99%	<99%	**126%**	**115%**
	P1	VASONA-METCALF 230KV [5932]		<99%	<99%	**116%**	**105%**
	P1	SARATOGA-VASONA 230KV [5931]		<99%	<99%	**112%**	**101%**
NEWARK #11 230/115 kV TB	P7	Newark-Ravenswood 230 kV and Tesla-Ravenswood 230 kV lines	462	97%	**102%**	**109%**	**114%**
	P1	NEWARK D 230/115KV TB 7		<99%	<99%	99%	**102%**

Table 2:*Unresolved Overloads Referenced in Appendix B Table B.3-19 not observed in 2035 & 2040 Summer Peak models*

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla-Trimble-Metcalf	2035-GBA-SP-V2 With WaNTEP Tesla - Newark AC	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With WaNTEP Tesla - Newark AC
NEWARK-NRS 230KV LINE	-	-	1037 / 1441	<99%	<99%	<99%	<99%	<99%	<99%
MONTA VISTA-BRITTON 115KV LINE	-	-	199 / 199	<99%	<99%	<99%	<99%	<99%	<99%
AMES-WHISMAN 115KV LINE	P2	MNTA VSA 115KV - MIDDLE BREAKER BAY2	160 / 193	**100%**	72%	92%	<99%	<99%	<99%
	P7	Britton-Monta Vista & Lawrence-Monta Vista 115 kV Lines		**103%**	80%	97%	<99%	<99%	<99%

Table 3: *P1 & P7 Overloads Unresolved with Tesla-Trimble-Metcalf Project Addressed by WaNTEP in 2035 and 2040*

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla-Trimble-Metcalf	2035-GBA-SP-V2 With WaNTEP Tesla - Newark AC	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With WaNTEP Tesla - Newark AC
FMC-SANJOSEB 115kV LINE	P1	NRS-TRIMBLE 230kV	307	93%	**115%**	89%	**100%**	**Not Solved**	96%
	P1	NRS-TRIMBLE 230kV [0] (new Trimble) HVDC RAMPDOWN TO 500 MW		72%	**105%**	69%	81%	**116%**	76%
	P1	NRS-Trimble 230 kV		93%	**115%**	89%	**100%**	**125%**	96%
br_KRS-FMC JCT #1 115kV	P1	NRS-Trimble 230 kV	288	<99%	<99%	<99%	74%	**101%**	70%
LS ESTRS-NORTECH #S5 115kV LINE	P1	NRS-Trimble 230 kV	320	<99%	<99%	<99%	88%	**104%**	87%
	P1	NRS-TRIMBLE 230kV [0] (new Trimble) HVDC RAMPDOWN TO 500 MW		<99%	<99%	<99%	84%	**100%**	81%
MARTNZ D-ALHAMTP2 115kV LINE	P7	Pittsburg-Tidewater 230 kV and Pittsburg-Tesoro SW STA 230 kV lines	96	<99%	<99%	<99%	**101%**	**100%**	98%
MONTAGUE-RINGWOODSWST 115kV LINE	P7	Swift - Metcalf & Piercy - Metcalf 115 kV Lines	300	42%	**101%**	42%	44%	**109%**	45%

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla-Trimble-Metcalf	2035-GBA-SP-V2 With WaNTEP Tesla - Newark AC	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With WaNTEP Tesla - Newark AC
MONTAGUE-TRIMBLE-GIS 115kV Line	P0	Base system (n-0)	239	65%	**130%**	68%	68%	**138%**	70%
NRS-TRIMBLE 230kV line	P0	Base system (n-0)	1037	<99%	<99%	<99%	68%	**100%**	66%
NEWARK F-LCKHD J1 115kV LINE	P7	Metcalf-Hicks and Metcalf-Vasona 230 kV Lines	194	97%	**103%**	99%	97%	**103%**	99%
	P1	HICKS-METCALF 230KV [4910]		<99%	<99%	<99%	93%	**100%**	95%
NRS 400-SRS #1 **OR** #2 115kV	P7	Trimble - San Jose B & FMC - San Jose B 115 kV Lines	303	<99%	<99%	<99%	99%	**101%**	99%
	P1	FMC-SAN JOSE B 115KV [2021]		<99%	<99%	<99%	99%	**101%**	99%
NRS 400 230/115 Kv TB 2	P0	Base system (n-0)	420	<99%	<99%	<99%	94%	**103%**	96%
	P7	Trimble - San Jose B & FMC - San Jose B 115 kV Lines	457	93%	**101%**	94%	97%	**105%**	99%
	P7	Trimble - San Jose B & Kifer - FMC 115 kV		<99%	<99%	<99%	93%	**101%**	94%
	P1	NEWARK D 230/115KV TB 9		<99%	<99%	<99%	92%	**100%**	94%

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla-Trimble-Metcalf	2035-GBA-SP-V2 With WaNTEP Tesla - Newark AC	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With WaNTEP Tesla - Newark AC
	P7	Newark-Ravenswood 230 kV and Tesla-Ravenswood 230 kV		<99%	<99%	<99%	93%	**101%**	95%
	P1	FMC-SAN JOSE B 115KV [2021]		93%	**100%**	94%	97%	**105%**	98%
	P1	KIFER-FMC 115KV [2020]		<99%	<99%	<99%	93%	**101%**	94%
	P1	NORTECH-NORTHERN RECEIVING STATION 115KV [1551]		<99%	<99%	<99%	93%	**100%**	94%
	P1	SANJOSEB230 230/115KV TB 1		<99%	<99%	<99%	93%	**102%**	94%
	P7	Newark - Kifer & FMC - Kifer 115 kV Lines		93%	**100%**	95%	97%	**104%**	98%
	P7	Kifer - FMC 115 kV and Newark - Trimble 115 kV Lines		<99%	<99%	<99%	93%	**101%**	94%
	P1	DVRaGT1 13.80kV & DVRbGt2 13.80kV &		<99%	<99%	<99%	92%	**100%**	94%

Overloaded Facility	Con Cat	Contingency	Rating (MVA)	2035-GBA-SP-V2 With LC2024	2035-GBA-SP-V2 With Tesla-Trimble-Metcalf	2035-GBA-SP-V2 With WaNTEP Tesla - Newark AC	2040-GBA-SP-V2 With LC2024	2040-GBA-SP-V2 With Tesla – Trimble - Metcalf	2040-GBA-SP-V2 With WaNTEP Tesla - Newark AC
		DVRaST3 13.80kV Gen Units							
NRS 300 230/115 kV TB1	P0	Base system (n-0)	500	<99%	<99%	<99%	95%	**104%**	97%
	P7	Trimble - San Jose B & FMC - San Jose B 115 kV	560	<99%	<99%	<99%	96%	**103%**	97%
	P1	FMC-SAN JOSE B 115KV [2021]		<99%	<99%	<99%	95%	**103%**	96%
	P1	SANJOSEB230 230/115KV TB 1		<99%	<99%	<99%	91%	**100%**	93%
	P7	Newark - Kifer & FMC - Kifer 115 kV Lines		<99%	<99%	<99%	95%	**102%**	97%

[1] Draft Plan, pp. 69-70.
[2] *Id*.
[3] See the City and County of San Francisco Comments on 2025-2026 Transmission Planning Process Meeting 9/24 and 9/25 2025-2026 Transmission planning process, located at https://stakeholdercenter.caiso.com/Comments/AllComments/2CD110FD-8815-46B5-887A-FCF3E85603A2#org-feada347-0e01-4d33-9d00-77e0b0a51c78
[4] Appendix B to the Draft Plan, B-130.
[5] *Id*.
[6] City and County of San Francisco Comments on 2025-2026 Transmission Planning Process Meeting 9/24 and 9/25
2025-2026 Transmission planning process, located at
https://stakeholdercenter.caiso.com/Comments/AllComments/2CD110FD-8815-46B5-887A-FCF3E85603A2#org-feada347-0e01-4d33-9d00-77e0b0a51c78
[7] Draft Plan, p.70.

2. Please provide your organization's comments on Policy-driven Projects Recommended for Approval.

No comments at this time.

3. Please provide your organization's comments on the Economic Assessment.

No comments at this time.

4. Please provide your organization's comments on Maximum Import Capability Expansion Requests.

No comments at this time.

5. Please provide your organization's comments on Frequency Response.

No comments at this time.

6. Please provide your organization's additional comments on the Draft 2024-2025 Transmission Plan April 15, 2025 stakeholder call discussion.

No comments at this time.