



Stakeholder Comments Template

FERC Order No. 1920 Compliance

This template has been created for submission of stakeholder comments on the FERC Order No. 1920 Compliance, which took place on September 18, 2025. The meeting presentation and other information related to this initiative may be found on the [CAISO.com calendar](https://www.caiso.com/calendar) and under [Miscellaneous Meetings](#).

Upon completion of this template, please submit it to isostakeholderaffairs@caiso.com.

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Submissions are requested by close of business on October 2, 2025

Submitted by	Organization	Date Submitted
<i>(submitter name and phone number)</i>	<i>(organization name)</i>	<i>(date)</i>

Please provide your organization's comments on the following issues and questions.

1. Please provide your feedback on the FERC Order No. 1920, held on September 18, 2025.

ACP-California appreciates CAISO sharing its plans for the upcoming changes to the transmission planning process associated with the Order 1920 compliance filing. And ACP-California recognizes that, while CAISO is already achieving many of the goals of Order 1920 through its planning processes, FERC Order 1920 is more prescriptive and will require some modifications to CAISO's current TPP timing and practices.

Perhaps most notably, in order to comply with Order 1920, CAISO will move from overlapping 15-month TPP cycles to a two-year planning cycle, commencing after the completion of the 2027-28 TPP. ACP-California appreciates that CAISO will conduct – in the interim/odd years during the two-year planning cycle – a Reliability Assessment. This should help ensure that there is an opportunity to approve needed projects in a timely fashion during interim years. While CAISO is proposing this to be a “reliability only” assessment, we encourage CAISO to leave the tariff language open to other, urgent approvals that may be required in interim/odd years. For instance, there may be a policy-driven project that is necessitated by a new resource portfolio from the CPUC, which is well understood and, if warranted, should have the *option* of being approved through this interim study process as well. While we recognize this would not be the "standard" approach, we encourage CAISO to leave flexibility in its tariff so that this type of approval could happen during the interim years, if needed.

ACP-California appreciates CAISO proposed long-term planning approach and looks forward to engaging in these longer-term assessments and project approvals. We encourage CAISO to continue to build on its more proactive, forward-looking approach to transmission planning with the new 20-Year process.

Finally, as CAISO is already aware, the change in the timing of the TPP study processes will require close coordination and alignment with various other processes both at the CAISO and with other entities. CAISO will need to work closely with the CPUC to ensure that the resource portfolios being studied in the two-year transmission planning cycle are sufficiently firm that they are the basis for actual project approvals. It has become somewhat common for the CPUC to request a “sensitivity” study before proceeding with including resources in a portfolio and having CAISO approve the needed transmission for those resources. But this practice will become much more time-consuming, and ineffective, under a two-year TPP cycle. If CAISO studied a sensitivity in one two-year TPP and waited until the next TPP cycle to consider approvals associated with that sensitivity, it could delay project approval by up to four years. Thus, CAISO will need to work closely with the CPUC and other LRAs to ensure these unnecessary project delays do not occur because of the change in TPP timing. This will also require enhanced certainty from the LRAs on the resource portfolios that CAISO studies in the two-year TPP cycles.

Additionally, CAISO will need to consider how the two-year TPP cycles line up with the new interconnection process and Transmission Plan Deliverability (TPD) allocation cycles. Clearly having policy-driven transmission approvals occur every other year will drive certain year’s interconnection cluster and TPD allocation cycles to be more advantageous for interconnection customers than others. And it is possible that further changes to the interconnection and TPD allocation processes may be warranted as a result. We look forward to working with CAISO to ensure alignment of the future Order 1920 compliant transmission planning process and the other processes which need to effectively coordinate with it.