



## Stakeholder Comments Template

### Annual Summer ATC Assessment - 2026

This template has been created for submission of stakeholder comments on the Annual Summer ATC Assessment meeting held on March 31, 2026. The Stakeholder meeting presentation and other information related to this initiative may be found on the [Miscellaneous meetings webpage](#).

Upon completion of this template, please submit it to [ISOStakeholderAffairs@caiso.com](mailto:ISOStakeholderAffairs@caiso.com).

Submissions are requested by close of business on **April 14, 2026**

Submitted by	Organization	Date Submitted
<i>Jordan Miner (415-703-1840) jordan.miner@cpuc.ca.gov</i>	<i>CPUC</i>	<i>4/3/2026</i>

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

1. Please provide your organization's feedback on the Annual Summer ATC Assessment meeting held on March 31, 2026.

Energy Division staff (ED staff or staff) of the California Public Utilities Commission (CPUC) develops and administers energy policy and programs to serve the public interest, advises the CPUC, and ensures compliance with CPUC decisions and statutory mandates. ED staff provides objective and expert analyses that promote reliable, safe, and environmentally sound energy services at just and reasonable rates for the people of California.

ED staff thanks CAISO for the analysis provided during the March 31<sup>st</sup> meeting. At a high level, ED staff would have liked to see more extensive analysis, as detailed in response to question 2. ED staff cautions CAISO from using the data from the last two years to conclude that more extensive analysis of internal congestion is not needed, as discussed further below.

ED staff does not support retirement of the Transmission Service and Market Scheduling Priorities Path 26 assessment, which assesses the potential impact of wheel throughs on internal congestion on Path 26. High priority wheel through transactions could

potentially cause additional congestion that reduces the amount of capacity available for native load, and in an extreme cases, could potentially cause the CAISO BAA to curtail native load. Native load and priority wheel through (PWT) transactions receive equal scheduling priorities, but due to NERC regulations it is very difficult to curtail PWT wheels. In extreme cases, this has resulted in the CAISO BAA curtailing native load to support these exports.

CAISO's analysis of PWT awards indicates that PWT awards have been relatively small in recent years. However, this likely has to do with the fact that 2024 and 2025 were mild, compared to previous summers. But conditions in 2024 and 2025 may not be indicative of issues that could arise this summer or in future years.

2. Please provide your organization's request of topics of interest for discussion in future meetings.

ED staff requests CAISO conduct a system wide power flows analysis and requests a list of specific detailed analysis that ED staff will list below. A system wide power flow analysis will allow stakeholders to better understand which transmission paths become binding during normal and stressed system conditions. While Path 26 is a critical component of the grid, there are many other transmission paths that form the backbone of the transmission grid that CAISO's current Path 26 analysis does not capture. ED recommends that CAISO conduct:

- EDAM-wide power flow analysis, identifying if there is a need to increase native load set aside capacity, due to changing power flows as a result of EDAM.
- Continued Path 26 assessment and analysis.
- Analysis of impacts from new South to North flows (SunZia, etc.), and new North to South flows.
- Year over year ATC comparative analysis.
- Power-flow analysis of impacts of WEIM departures to Markets+, and more generally power flow analysis of how the DAM will change with two competing markets.