

Submitted Comment on Transmission Development Forum

New Energy Works Consulting comments on the July 2026 Transmission Development Forum.

1. Re PG&E GI Network Upgrades 24RSMT-GPN01, and C14P1-GGR09 (collectively, Tesla 230 and 500 kV bus extensions, 230 kV SCD mitigation, and associated T line work). Although the current In Service Date (ISD) of April 2031 is not a change from the prior TDF (January 2026), the note for both projects includes a significant update: "Seismic impact to expansion area, evaluating options. In-Service date impacts are not conclusive." On the call PG&E representatives indicated that information was being collected, and that PG&E expects to have more information in the time frame of this TDF comment-response cycle. Specifically, PG&E indicated that a new location had been identified for the 230 kV bus extension that avoids certain areas that are now unacceptable due to seismic risks. Whether that new location would allow the extended buses to remain open air or require GIS was also under re-evaluation.
 - a. Please provide an update on the scope of these projects and whether a change in the current ISD is required or likely. Please note that C14 projects that have cost responsibility for these upgrades all have signed GIAs and are actively negotiating offtake agreements. A change in the ISD of these upgrades may materially impact these negotiations.
 - b. Will changes in scope create a change in cost that will impact C14 generators in the 2026 reassessment?
 - c. Multiple C15 projects have POIs at the Tesla 230 kV yard, as expanded. If GIS is now required, will this change in scope change that allocated costs assigned to these projects? Will the change be communicated in the facility study or in some other way?
2. Re PG&E TPP NU1415-R-03, Martin 230 kV Bus Extension: the latest ISD was moved out 14-months and includes the note "Delay due to scope development. Updated GIS commissioning duration received from Siemens resulted in delay in ISD." Question: is all or just a portion of Martin 230 kV being converted to GIS? If a C16 generator requests to interconnect at Martin 230 kV, will it need to connect to a position within the (new) GIS or will open positions remain available for a C16 gentie termination?
3. Re: SCE TPP 2425-R-22 "Serrano 500 kV SCD Mitigation" shows an August 2033 ISD. Before this project was approved as a TPP project, the same NU was identified as a required mitigation in Cluster 14 Phase 2 and the ISD in that study and the 2024 reassessment (i.e. before the project was approved in the TPP) was December 2031 (74-mo beginning early Q4 2025)--20-mo sooner. Multiple C14 projects dependent on this upgrade now have signed GIAs. How will this latest, pushed-out date impact CODs in those executed GIAs?