



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.

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

Submitted by	Organization	Date Submitted
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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.

PG&E appreciates CAISO's presentation and the opportunity to provide feedback on the Annual Summer ATC Assessment. PG&E has questions and concerns regarding the proposal to remove the Path 26 sensitivity analysis and offers the following comments for CAISO's and stakeholders' consideration.

- **Background and rationale:** The Path 26 sensitivity analysis was established as part of the TSMSP initiative. The ATC process does not assess the deliverability of the high-priority wheel-through transactions. The initiative concluded that monitoring Path 26 was an important safeguard despite a significant portion of the stakeholder wanting more safeguards and monitoring. The sensitivity analysis was intended to detect potential operational or deliverability concerns. Retiring the Path 26 analysis would eliminate this visibility and could prevent detection of future issues. Until CAISO adopts a new study methodology that explicitly ensures deliverability of the wheel-throughs in ATC calculations, continued monitoring

remains important for Path 26 and should be expanded to other frequently congested internal transmission facilities.

- **The logic used to justify the removal of the monitoring is flawed:**
 - The lack of issues on Path 26 over the last few years does not prevent there being issues on this path in the future. The last few Summers have been mild both in California and around the West. It is possible that the correct conditions did not exist in this limited sample of years.
 - Low wheel-through reservations are in part due to low amounts of ATC. Had there been greater ATC made available, it is possible that a problem would arise. There is nothing inherent in the current methods that would prevent an undeliverable volume of wheel-throughs transactions being awarded ATC should the capability become available on the interties.
- **Removal of the Path 26 monitoring lack clear justification:** It is unclear what specific problem or deficiency CAISO is seeking to address by retiring the Path 26 sensitivity analysis. The proposal does not clearly articulate the motivation or benefits of removing this monitoring tool.
- **What is the Administrative Burden of the Monitoring?** PG&E would like to better understand whether CAISO views the Path 26 sensitivity analysis as creating an administrative or operational burden, and if so, what that burden is and how it compares to the value of the information provided.
- **What is the Cost of Redispatch:** The fact that the ATC calculation does not test for deliverability means that the CAISO relies on redispatch to ensure deliverability should an internal constraint bind. However redispatch is not free of cost. PG&E would like greater transparency regarding the redispatch costs associated with the six days identified in the analysis (slide 18: “There were totally 6 days Path 26 North to South daily peak flow more than 3500 MW from 6/1/2025 till 9/30/2025”). If precise values cannot be given due to the lack of causality in nodal markets, then an estimate is sufficient.

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

Not at this time.