

Order 1920 Draft Tariff Language

Submitted by	Company	Date Submitted
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PG&E offers comments on the following sections of CAISO’s Draft Tariff Language in compliance with FERC Order 1920, as posted October 3, 2025.

24.3.3 (c) states that CAISO will post meeting materials for the Unified Planning Assumptions five (5) calendar days prior to the Assumptions Meeting. Given the new schedule and longer two-year timeframe for development of the Plan, PG&E requests that CAISO consider providing more review time for stakeholders in this section.

24.4.2 provides a 30-day window for PTO’s to prepare and submit solutions in the Phase 2 Reliability Request Window following the CAISO preliminary reliability study results. Again, PG&E requests that CAISO consider a longer window in light of the more extended schedule for the process.

24.4.5 PG&E requests to know if there will be a feasibility evaluation of the Regional Facility alternative technologies before approval?

24.4.6.5 With regard to the inclusion in the long-term regional transmission process of interconnection related projects that have been studied in multiple cycles and have not resulted in approved upgrade projects, PG&E requests clarification on the following:

- Why was the threshold value of \$30 million dollars chosen?
- If an interconnection upgrade project results from application of this section, does the interconnection customer bear any cost responsibility, or is the resulting project cost included in the Transmission Access Charge (TAC)?
- Are interconnection upgrade projects studied in this section considered as reliability, policy, or economic?

24.11.2 In implementing the seven factor benefits evaluation for long-term regional projects, CAISO references production cost modeling (PCM) in factors 3, 4, and 5. This will expand the use of PCM in the TPP beyond its current application (primarily in the Economic Policy studies).

Does CAISO intend to provide greater clarity on the assumptions to be used in future Business Process Manual (BPM) language? PG&E notes that the results of the benefits evaluation will likely be highly sensitive to the formulation of the PCM, and encourages CAISO to spend adequate time with stakeholders to fully vet the methodology and assumptions to be used during implementation of the new process.

24.11.6 As noted in PG&E's comments on the September 18 stakeholder meeting, the basis for the 10% trigger for "significant" cost overrun and project reevaluation has not been explained to stakeholders. PG&E would appreciate further exploration of the level of this trigger and why the 10% level is reasonable.