



## 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](mailto:isostakeholderaffairs@caiso.com).

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

Submitted by	Organization	Date Submitted
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### **Please provide your organization's comments on the following issues and questions.**

PG&E commends CAISO for its efforts to reform the Transmission Planning Process in compliance with FERC Order 1920. PG&E encourages CAISO to continue maintaining close engagement with PTOs and other stakeholders in developing the processes and methodologies required as the planning framework evolves. The early and close engagement in these matters will also support the PTOs' road map and preparation for the upcoming changes.

PG&E appreciates this opportunity to provide feedback on the CAISO stakeholder meeting held September 18, 2025, and the presentation of plans for compliance with FERC Order 1920. PG&E requests further clarification on the following points:

1. On page 15, CAISO identifies the seven benefit test for evaluation and selection of long term transmission facilities. Please clarify how CAISO intends to measure and score each benefit. How will the overall score be weighted to compare projects with different benefits?
2. Is CAISO proposing a specific threshold as to how many of the seven benefits must be met (or exceed a minimum threshold) in order for a project to proceed? In other words, is there a weighting or threshold with regard to the number of benefits to be met (e.g. all seven; at least five out of seven; etc.), versus how strongly individual benefits are demonstrated?

3. As noted on p. 7, FERC Order No. 1920 (including subsequent Orders 1920-A & 1920-B) requires addressing generation-interconnection-related needs that have arisen multiple times but have not yet been resolved. Will CAISO please clarify what criteria will be applied to determine which projects within the CAISO cluster process may qualify for further evaluation under this new window? Will the criteria apply retroactively to projects already in the interconnection queue or only prospectively to new applications starting with a future cluster year?
4. On p. 20, CAISO cites a 10% cost exceedance trigger for reevaluation of an already selected long term regional transmission facility. However, the FERC order allows each Transmission Provider flexibility to establish its own threshold cost increase trigger:

We provide flexibility to transmission providers to propose such processes and procedures, subject to the following requirements. First, reevaluation on the basis of cost increases or significant changes in federal, federally-recognized Tribal, state, or local laws or regulations must be part of a subsequent Long-Term Regional Transmission Planning cycle following selection and must take into account not only the updated costs but also the updated benefits of the Long-Term Regional Transmission Facility. Second, in order to allow for reevaluation to occur, these processes and procedures must include mechanisms for tracking costs so that transmission providers have an accurate way to determine if the actual or projected costs of the previously selected Long-Term Regional Transmission Facility exceed cost estimates by the relevant threshold, therefore requiring transmission providers to reevaluate that Long-Term Regional Transmission Facility. Third, the reevaluation processes and procedures must seek to maximize benefits accounting for costs over time without over-building transmission facilities. Again, we expect transmission providers in establishing these processes and procedures, including potential mitigation measures, to consider outcomes that enable more efficient or cost-effective Long-Term Regional Transmission Facilities to be developed, while addressing the risk of over-building. ([FERC Order 1920](#), par. 1052, pp. 742-4)

PG&E requests CAISO clarify the basis for its proposal of 10% as the appropriate threshold for project reevaluation.

PG&E understands the need for cost containment, especially for projects that have been awarded under a competitive bid process and granted an Approved Project Sponsor Agreement (APSA). However, the APSA itself provides CAISO with mechanisms for cost tracking and review of cost and scope changes that may exceed the original bid envelope. Where such cost overruns are deemed by CAISO to be just and reasonable (for example, due to circumstances beyond the project sponsor's control), the project may still be allowed to proceed.

By contrast, an automatic project reevaluation and potential rescoping or reassignment of an already awarded project, is a “big hammer” that may result in years of delay for needed transmission development. PG&E believes the automatic reevaluation trigger should be reserved for cases in which the cost overrun is sufficiently large enough to call into question whether the cost and scope, as originally awarded via the APSA, still represent the best solution for meeting the needs of the transmission system on a going-forward basis.