



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.

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.

1. Please provide your feedback on the FERC Order No. 1920, held on September 18, 2025.

SDG&E encourages CAISO to proceed cautiously with moving to the new Order 1920 Process, specifically with regard to the Interim Reliability Assessment in odd years. Recent developments at the federal and state level that affect resource planning (specifically relating to Out of State and Offshore Wind) highlight how rapidly future portfolios can change. Additionally, as the number of large load interconnection requests grows, it is increasingly important to ensure that the process evolves to meet future needs. Therefore, it may be prudent for CAISO to maintain the option (codified in a tariff or other appropriate location) of reverting back to performing the full TPP every year.

Relatedly, CAISO has mentioned the option to upgrade the Interim Reliability Assessment to a full TPP. SDG&E would like CAISO to clarify the triggers (load forecast or otherwise) that would cause this upgraded process in the odd years. Allowing stakeholder community feedback into these

triggers will ensure robustness to the extent possible, given the aforementioned regulatory uncertainties.

Finally, SDG&E requests clarification on how the interim reliability analysis would comply with TPL 001, where the studies need to be performed annually.