



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.

Introduction

Sonoma Clean Power Authority (SCPA) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) proposed compliance approach under FERC Order No. 1920. As a Community Choice Aggregator serving Northern California, SCPA is deeply invested in ensuring that long-term transmission planning supports state policy objectives, enables cost-effective procurement, and provides reliable service to customers.

FERC Order No. 1920 requires transmission providers to conduct forward-looking, scenario-based planning on a 20-year horizon, supported by transparent cost allocation and opportunities for stakeholder engagement. CAISO's compliance filing is a critical opportunity to align transmission planning with California's ambitious clean energy goals while maintaining reliability and affordability.

I. Scenario Development and State Coordination

SCPA strongly encourages CAISO to strengthen coordination with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to ensure that all scenarios are grounded in actual procurement trajectories and state policy mandates.

While FERC requires the study of three diverse scenarios, CAISO's proposal risks overreliance on a base portfolio with incremental sensitivities. SCPA recommends instead that CAISO develop three clearly distinct scenarios that:

1. Reflect high load growth and electrification across transportation, buildings, and industry;
2. Incorporate emerging and transformative technologies, such as offshore wind, next-generation geothermal, advanced storage, and grid-enhancing technologies; and
3. Capture alternative resource and policy trajectories, recognizing uncertainty in technology adoption and consumer demand.

Transmission plans should be evaluated based on their robustness across multiple futures, not optimized narrowly around a single preferred case. A resilient grid requires solutions that perform reliably under diverse conditions. Developing three clearly distinct portfolio will inform the value of transmission investments that may provide benefits across different likely futures.

II. Planning Cadence and Comprehensive Reviews

SCPA supports CAISO's proposal to transition to a biennial comprehensive transmission planning cycle with annual interim reliability assessments. However, SCPA urges CAISO to adopt a uniform 20-year planning horizon in every cycle, rather than alternating between 10, 15, and 20 year outlooks.

A consistent 20 year horizon will:

- Align with California statute, which requires a minimum 15-year outlook in the CPUC's Integrated Resource Planning process;
- Recognize that large-scale transmission projects often require 10-15 years to plan, permit, and construct; and
- Provide consistency across cycles, improving comparability of results and offering greater certainty for developers and load-serving entities making long-term commitments.

To maximize efficiency, SCPA further recommends that CAISO synchronize the biennial TPP cadence with the CPUC's IRP portfolio adoption cycle. Ensuring that each transmission planning process reflects the most recent IRP portfolios will mitigate the persistent disconnect between generation siting and transmission planning, thereby enabling policy-driven upgrades to be identified and approved in time to support procurement.

At the same time, CAISO must maintain annual reliability assessments to address short-term deliverability, resource adequacy, and interconnection needs. These annual studies are essential to ensure reliability while biennial comprehensive reviews focus on long-term policy and economic need.

III. Re-Evaluation Criteria for Long-Term Projects

SCPA supports the requirement in Order No. 1920 for the re-evaluation of previously approved long-term transmission facilities. To ensure transparency and avoid arbitrary determinations, CAISO should adopt uniform and clearly defined thresholds in its Business Practice Manuals (BPMs), including:

- A cost escalation threshold of 20 percent or more above the approved estimate;
- A schedule delay threshold of more than 12 months beyond the approved in-service date; and
- A planning assumption threshold triggered by significant changes in load growth, policy mandates, or resource trajectories.

These thresholds should be codified, applied consistently across projects, and paired with a transparent stakeholder notification and review process whenever a project is placed into re-evaluation.

IV. Integrated Evaluation of Multi-Benefit Projects

SCPA is concerned that CAISO's current planning process evaluates policy-driven upgrades (e.g., reflected in Transmission Plan Deliverability [TPD] needs) and economic upgrades (e.g., reflected in congestion cost relief) largely in isolation. This siloed approach risks overlooking projects that could cost-effectively achieve both objectives simultaneously.

FERC Order No. 1920 explicitly requires transmission providers to consider a broader set of benefits in long-term planning. In the spirit of this requirement, CAISO should develop a more integrated benefit assessment framework that recognizes and quantifies projects providing multiple categories of value.

For example, relieving TPD constraints in Northern California would not only support state policy objectives by enabling the deliverability of clean resources, but would also mitigate Path 15 congestion, a well-documented economic bottleneck. The combined value of these benefits should be weighed against project costs, rather than evaluating each benefit stream in isolation.

By formally recognizing and quantifying multi-benefit projects, CAISO can better identify solutions that deliver higher system-wide value, improve affordability for ratepayers, and ensure that policy and economic objectives are advanced in tandem.

V. Cost Allocation and Voluntary Funding

SCPA supports CAISO's proposal to permit voluntary funding of long-term projects that do not meet formal selection criteria. This mechanism may provide a valuable pathway for advancing policy-driven or economically justified upgrades that would otherwise face delays.

However, greater clarity is needed on the treatment of voluntarily funded projects. Specifically, CAISO should clarify:

- How voluntarily funded projects will be integrated into CRR feasibility and deliverability allocation frameworks, to ensure equitable treatment of customers.
- Whether such projects may be reconsidered for cost recovery or broader regional selection in subsequent cycles if system conditions evolve.

VI. Conclusion

SCPA appreciates CAISO's leadership in implementing FERC Order No. 1920 and recognizes the significant effort required to transition to a new transmission planning framework. By enhancing state coordination in scenario design, standardizing the planning horizon, codifying re-evaluation thresholds, and clarifying the role of voluntary funding, CAISO can establish a transparent and durable framework that ensures reliability, advances California's policy objectives, and supports cost-effective procurement for customers.

SCPA thanks CAISO for the opportunity to provide these comments and looks forward to continued collaboration throughout the compliance process.