



May 13, 2026

Joe Eto, Chair
Board of Governors
California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

Dear Chair Eto and the CAISO Board of Governors:

Golden State Clean Energy (“GSCE”) strongly supports the draft 2025-2026 Transmission Plan and recommends the CAISO Board of Governors approve the plan. This plan takes important steps to advance affordability through the economic assessment that identifies the need for new 500 kV transmission infrastructure in the San Joaquin Valley to alleviate costly congestion. GSCE supports CAISO’s decision to continue its comprehensive analysis and identify a long-term solution over the next year, and we encourage CAISO to keep the potential for significant resource integration in the San Joaquin Valley front of mind as it designs the solution. GSCE and the Westlands Water District are working to implement the Valley Clean Infrastructure Plan (“VCIP”), which can be an important and cost-effective part of the transmission solution in the San Joaquin Valley.

The draft transmission plan identifies \$1.8 billion in annual congestion costs on the Path 15 corridor by 2035, the earliest study year in this TPP cycle, with increasing congestion costs by 2040.¹ This is generally consistent with Department of Market Monitoring reports over recent years, which already identify similar congestion trends in the market.² Given these data points, it is reasonable to assume significant congestion costs arise before 2035. The significant and increasing congestion costs support the need to bring new transmission infrastructure in-service as soon as possible through projects that can be constructed quickly.

CAISO can leverage VCIP to drive new transmission infrastructure in the San Joaquin Valley to reduce Path 15 corridor congestion and integrate new solar and storage consistent with state policy. Assembly Bill 2661 (2024) gave Westlands the authority to build and own transmission

¹ CAISO, draft 2025-2026 Transmission Plan, at pg. 119 (Table 4-1), April 7, 2026.

² CAISO Dept. of Market Monitoring, 2025 Q4 Report on Market Issues and Performance, at pg. 84-86, March 2026 (see especially Figure 6.12).

with the goal of unlocking solar development in its territory, and the California Public Utilities Commission's resource portfolios have called for significant new solar development in the Fresno transmission area (13.5 GW in this TPP cycle). Westlands has already taken major steps to implement VCIP, including certifying a Program Environmental Impact Report in December of 2025. Working with a public power entity on an already permitted transmission project can expedite development and allow the benefits of new regional transmission to begin accruing sooner. VCIP can be part of the solution to address Path 15 corridor congestion issues and allow CAISO to implement the California Legislature's intent under Assembly Bill 2661.

GSCE appreciates the significant time and effort CAISO staff put into developing this TPP cycle's transmission plan, as evidenced by the 30 different transmission project alternatives examined when studying ways to alleviate persistent transmission congestion through the middle of the state. We look forward to continuing to engage with CAISO and being part of California's clean energy future.

Sincerely,

Signed by:

Patrick Mealoy

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