



Independent Energy Producers Association

May 14, 2026

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

RE: Revised Draft 2025-2026 Transmission Plan

Dear Chair Eto:

The Independent Energy Producers Association (IEPA)¹ is an active participant in the Transmission Planning Process on behalf of our member companies and commented in support of the Draft 2025-2026 Transmission Plan (“Draft Plan”). Upon review of parties’ comments to the Draft Plan, review of the “Revised Draft 2025-2026 TPP,” and Neil Millar’s May 12, 2026, Memorandum to the Board of Governors (“Memorandum”), it has come to our attention that the cancellation of the Serrano-Del Amo-Mesa 500 kV line has negative consequences for existing queued member projects. IEPA understands the economic reasons for cancelling the line but wants to highlight the reliability risks of not finding an alternative in this year’s TPP and requests consideration of queue deposit refunds for projects stranded by the line cancellation.

Following the posting of the Draft Plan, the 2025 Transmission Plan Deliverability (TPD) Allocation Report noted that the Serrano-Del Amo-Mesa line cancellation creates the Mira Loma-Mesa Area constraint, stranding around 10 GW of projects within Cluster 14. To make up for this lost transmission, the Memorandum calls for modification of the TPD to include battery energy storage system (BESS) projects in the SoCal Edison Metro area. Although IEPA is supportive of BESS, we acknowledge the unfortunate reality of newly implemented moratoriums or ordinances that severely limit BESS development.

The City of Covina adopted Ordinance 25-01 that established a total moratorium on all utility-scale BESS facilities within city limits. Additionally, Orange County adopted an ordinance that goes far beyond existing BESS safety standards in the California Fire Code and Building Standards Code. Ordinance 25-017 requires 100-foot setbacks to residential and community structures and mandatory-use permits that are issued through the local Planning Commission. Relying on BESS development in these areas or neighboring areas to relieve transmission congestion due to the cancelled Serrano-Del Amo-Mesa line is too risky without another alternative. IEPA appreciates Mr. Millar’s recommendation that the CAISO continue to assess the impacts of the cancellation of the project on interconnection, and we respectfully recommend that occur in this TPP cycle and the next. IEPA supports the comments of NextEra Energy in the Draft Plan

¹ IEP is California’s oldest and leading nonprofit trade association, representing the interests of developers and operators of independent energy facilities and independent power marketers. IEP members collectively own and operate approximately one-third of California installed generating capacity, which includes energy generation derived from solar, wind, hydropower, geothermal, biomass, highly efficient natural gas, and energy storage resources.

and refer the CAISO to their comments about alternative lines that could relieve the stranded projects behind the newly created constraint at Mira Loma-Mesa.

If the CAISO chooses to not proceed with an alternative line and relies on other methods, including BESS in the SoCal Edison Metro Area, the interconnection queue deposits for projects stranded behind the Mira Loma-Mesa constraint should be refunded. Through no fault of their own, projects behind the Mira Loma-Mesa constraint would not have options to reach commercial operation and should not be penalized for proposing viable projects that would have reached deliverability but for the cancellation of this line.

Thank you to the CAISO staff for their work on the Draft Plan. There are many aspects worthy of support as highlighted in IEP's Draft Plan comments. However, due to the issues identified by stakeholders in relation to the cancellation of the Serrano-Mira Loma-Mesa line, we respectfully request consideration of an alternative route and, if no route is identified, the return of interconnection queue deposits.

Sincerely,

Sara Fitzsimon

POLICY DIRECTOR

ATTORNEY AT LAW

INDEPENDENT ENERGY PRODUCERS ASSOCIATION

RE: Vice Chair, Honorable Mary Leslie
Honorable Severin Borenstein
Honorable Alice Reynolds
Honorable Jan Schori