The ISO received comments on the topics discussed at the July 29, 2026 stakeholder meeting from the following:

Copies of the comments submitted are located on the Miscellaneous Meetings Page under Transmission Development Forum at:
https://www.caiso.com/library/transmission-development-forum

The following are the ISO and PTO's responses to the comments.

1. EDP		
No	**Comment Submitted**	**Responses**
a	**C8P2-1 and C9P1-F12** **Borden–Gregg Reconductoring** The in-service dates for PG&E's Borden–Gregg No. 1 and No. 2 reconductoring projects have been delayed to February and March 2028. 1. Can you provide an update on the outstanding land-rights challenges and the expected timeline for resolving them? 2. When are the steel poles expected to be delivered? 3. If the poles are delivered earlier than anticipated, could the in-service dates be accelerated? 4. Are there any other material risks to the current February–March 2028 schedule?	**PG&E RESPONSE:** PG&E has successfully acquired all required land rights for both reconductoring projects. Steel pole deliveries are currently expected to begin in February 2027 and will support the planned construction sequence. Should pole deliveries occur earlier than currently anticipated, there may be opportunities to accelerate portions of the construction schedule and potentially advance the in-service dates. In addition to pole procurement, PG&E continues to monitor supply chain risks associated with conductor hardware procurement. Conductor hardware remains a schedule risk, with delivery expected May 2027. PG&E's understanding is the conductor hardware delay is being driven by challenges related to raw material sourcing within the supplier's manufacturing processes.
b	**LSPGC Manning Substation** The 2021–2022 LSPGC New 500/230 kV Substation project is listed as under construction, with an expected in-service date of June 2028. 1. Can you provide an update on construction progress, including whether physical construction has begun, and which major milestones have been completed? 2. Have all major long-lead materials and equipment been ordered? 3. Are the expected delivery dates for the long-lead items aligned with the June 2028 in-service date?	**LS POWER RESPONSE:** 1. Physical construction at the substation site started in March 2026. Physical construction for the 230kV line is expected to start in early 2027. 2. Structures have been ordered for the transmission line. Conductor is the last major long lead item to be ordered, and the order will be placed to align with the delivery timing need. 3. Yes. 4. Coordination and timing of the PG&E cutovers is the largest remaining risk that could affect the schedule. There are regular meetings between LS Power and PG&E to make sure the two companies'

	4. Are there any outstanding permitting, procurement, or construction risks that could affect the schedule?	efforts are staying aligned. The current planning between companies supports a June 2028 in-service data assuming the proper outage/clearance windows are approved.

2. EOLUS		
No	**Comment Submitted**	**Responses**
a	**GIP 20RSMT-4** **Metcalf 115 kV Breakers Overstress** There is no construction start date or current project status listed for this upgrade. Could you please provide the current development status and expected schedule?	**PG&E RESPONSE:** PG&E currently forecasts construction to begin in February 2028, with an anticipated in-service date of July 2028. As noted in the July 2026 Transmission Development Forum (TDF) reporting, engineering activities were temporarily paused while PG&E evaluated whether the project remained necessary based on updated system conditions. That evaluation has since been completed and engineering activities have resumed. During the course of project development, the scope was revised from a breaker replacement project to the installation of reactors only, which better addresses the identified overload concerns. PG&E is continuing project engineering and procurement activities consistent with the revised scope. Currently, long-lead material procurement remains the project's critical path and represents the primary schedule risk. PG&E will continue to monitor equipment procurement and project execution activities against the current forecasted July 2028 in-service date and provide updates through the TDF.
b	**C14P2-FPN02** **Los Banos 230 kV Circuit Breakers 252 & 262 Overstress:** This upgrade has a current in-service date of December 2028 in the July 2026 TDF, but the project status is listed as Not Assigned, and the note states "Q3 2026 - Removed." Could you please	**PG&E RESPONSE:** PG&E confirms that this project remains active and is currently in the engineering phase. The project status was incorrectly reported as "Not Assigned" in the July 2026 TDF reporting. The project continues to be assigned to the

	clarify the current status and whether the December 2028 ISD is still expected?	Generation Interconnection process as a PNU/RNU-driven upgrade. Based on current project plans, construction is expected to begin in September 2027, with a forecasted in-service date of December 2028.
c	**C13P1-GPN04** **Metcalf 230 kV Capacitor Circuit Breakers 654, 664, 674, and 684 Overstress:** This upgrade was not included in the presentation and does not show a construction start date or current project status. Could you please provide an update on the project's current status and expected schedule?	**PG&E RESPONSE:** This upgrade consists of two components. The first component, the Metcalf Substation 230 kV Capacitor Circuit Breakers Interim Solution, was successfully placed in service in November 2022 and has been providing interim mitigation for the identified overstress condition. The second component is the permanent solution for the Metcalf Substation 230 kV Capacitor Circuit Breakers 654, 664, 674, and 684 overstress. This portion of the project remains active and is currently progressing through project development activities. Based on the current schedule, construction is expected to begin in October 2026, with a forecasted in-service date of February 2027.
d	**C14P2-FPN05** **Los Banos 230 kV BAAH Bus Section Needed for CB 262 Overstress:** Our project is assigned to this PNU, but the latest update indicates that it has been removed. Could you please confirm whether this upgrade is no longer a PNU for our project, or if it has been replaced by another upgrade?	**PG&E RESPONSE:** PG&E confirms that this project remains active and is currently in the engineering phase. The project status was incorrectly reported as in the July 2026 TDF reporting. The project continues to be assigned to the Generation Interconnection process as a PNU/RNU-driven upgrade.

3. ESVOLTA		
No	**Comment Submitted**	**Responses**
a	**Wilson 115kV Area Reinforcement** (Project IDs: 1011-R-32 & C14P2-NFT03) & **Wilson Sub: Convert 115 kV DBSB to BAAH** (Project ID: POS-Q1932-NU1): Delayed by 9 months to February 2031 1. Have all long-lead materials been procured? What are the estimated delivery dates for those materials? 2. Has the engineering design been completed? If not, what is the target completion date? 3. Are there any outstanding studies? If so, which studies remain outstanding, and what are their target completion dates? 4. Have all necessary land rights for the project been secured? If not, which land rights remain outstanding, and when are they expected to be obtained? 5. Has the timeframe for receiving the required permits shifted? If so, what is the current target timeframe? 6. What caused the schedule/construction sequencing adjustment that resulted in the 9-month delay since the last TDF? 7. What is the largest remaining risk to the current schedule? 8. How likely is the ISD to be delayed further, and by how much if a further delay occurs?	**PG&E RESPONSE:** PG&E appreciates the questions regarding the Wilson 115 kV Area Reinforcement and Wilson Substation projects. Responses to the specific questions are provided below. 1. Breakers and transformers have been ordered, with current delivery forecasts indicating receipt in 2028. 2. Engineering design has not yet been completed. The current target for engineering completion is 2028. 3. There are currently no outstanding studies associated with this project. 4. No new land rights are required for the project. The project scope is within the perimeter of existing PG&E-owned land. 5. No changes to the permitting schedule have occurred. The only permits required for this project are ministerial permits and a Storm Water Pollution Prevention Plan (SWPPP). 6. The schedule has been further refined to incorporate a detailed construction sequence based on required outage and clearance windows. 7. PG&E is currently in the process of establishing an Engineering, Procurement, and Construction (EPC) contract.

		8. PG&E is unable to quantify the likelihood or magnitude of any future schedule delays at this time.
b	**C14P2-NFT04** **Borden-Storey 230kV reconductoring** (Delayed by 4 months to May 2030 1. Have all long-lead materials been procured. What are the estimated delivery dates for those materials? 2. Has the engineering design been completed? If not, what is the target completion date? 3. Are there any outstanding studies? If so, which studies remain outstanding, and what are their target completion dates? 4. Have all necessary land rights for the project been secured? If not, which land rights remain outstanding, and when are they expected to be obtained? 5. Has the timeframe for receiving the required permits shifted? If so, what is the current target timeframe? 6. There are 660 MW with GIAs in the queue behind this upgrade. What conditions would need to be met for this upgrade to no longer be required as a PNU? 7. What is the largest remaining risk to the current schedule? 8. How likely is the ISD to be delayed further, and by how much if a further delay occurs?	**PG&E RESPONSE:** Responses to the specific questions are provided below. 1. No, all long-lead materials have not yet been procured. Current estimates plan for delivery of the required materials in Q4 2027. 2. Engineering design has not yet reached completion. The project is currently targeting Issued for Construction (IFC) in December 2026. 3. No outstanding studies remain for this project. 4. Yes, to PG&E's knowledge all necessary land rights have been secured 5. No changes to the permitting schedule are anticipated. The current target for California Public Utilities Commission (CPUC) Notice of Construction (NOC) approval is Q3 2027. 6. C14P2-NFT04 is identified as an LDNU, with approximately 660 MW of generation capacity dependent on the project for Full Capacity Deliverability Status (FCDS). The project does not prevent any of the generation projects from reaching Commercial Operation Date (COD).

		7. PG&E continues to monitor project execution risks as part of its ongoing project development and schedule management efforts and take appropriate mitigation efforts to minimize disruptions to project schedules. 8. Based on current information, no additional delay is expected at this time. PG&E will continue to monitor project execution risks and update schedule projections as necessary.
c	**22rsmt-4** **New 230kV Switching Station to Loop Dos Amigos – Panoche #3 230kV** Delayed by 1 month to May 2030 1. Have all long-lead materials been procured? What are the estimated delivery dates for those materials? 2. Has the engineering design been completed? If not, what is the target completion date? 3. Are there any outstanding studies? If so, which studies remain outstanding, and what are their target completion dates? 4. Have all necessary land rights for the project been secured? If not, which land rights remain outstanding, and when are they expected to be obtained? 5. Has the timeframe for receiving the required permits shifted? If so, what is the current target timeframe? 6. What caused the 1-month schedule delay?	**PG&E RESPONSE:** Responses to the specific questions are provided below. 1. Yes. All long-lead materials have been ordered, including the outdoor bus support (OBS) equipment. 2. The project is currently in engineering design. Substation site selection alternatives are being evaluated as part of ongoing project development activities, and site selection will guide the schedule for completing engineering design. 3. The project is progressing several due diligence activities, including environmental studies (biological and cultural resources), property appraisals, geotechnical and soils analysis, an EMF study, and Phase I and Phase II site assessments. PG&E currently expects it

	7. There are 1,095 MW with GIAs in the queue behind this upgrade. What conditions would need to be met for this upgrade to no longer be required as a PNU? 8. What is the largest remaining risk to the current schedule? 9. How likely is the ISD to be delayed further, and by how much if a further delay occurs? 10. What was the reason this upgrade was not addressed in the biannual TDF presentation?	will take a few years for all the outstanding studies to be fully complete. 4. Land rights have not yet been secured. Additional land rights will be required for the new switching station site and the associated new transmission line facilities. 5. The permitting schedule remains under development as ongoing siting and routing studies continue to refine the project footprint and associated permitting requirements. 6. The one-month schedule adjustment is attributable to ongoing siting and routing studies. 7. This upgrade addresses a limitation associated with deliverability to Generation Interconnection projects. Specifically, the Dos Amigos power plant was identified as holding limiting elements required to provide deliverability to the generation projects. The original approach anticipated that the affected system owner would upgrade those limiting facilities. Because the affected system did not agree to perform those upgrades, the required solution was revised to radially feed the Dos Amigos power plant and loop in a new switching station. As an LDNU-driven upgrade, no other straightforward alternatives have been identified at this time.

		8. Project development activities continue to include CPUC permitting and land acquisition efforts. 9. PG&E is unable to quantify the likelihood or magnitude of any future schedule delays at this time. 10. This project was not presented during the TDF because the planned in-service date change did not meet the TDF presentation threshold of a ±3-month schedule change. As of the July 2026 TDF reporting cycle, the project's overall status was fundamentally unchanged from the January 2026 TDF update.

4. SB ENERGY		
No	**Comment Submitted**	**Responses**
a	**C13P1-KGR05** **Midway Substation 230 kV bus and 27 circuit breakers overstress - Revised to Install (2) Bus Reactors.** Install 2 x 16 ohm series bus reactors between Midway Substation 230 kV bus sections D and E (16 ohm parallel/8 ohm net) A significant amount of queued generation is dependent on the Midway substation 230kV bus and 27 circuit breakers overstress mitigation to achieve their backfeed / in-service dates. 1. What progress has PG&E made in determining whether this upgrade can be accelerated. 2. When does PG&E anticipate seeing further acceleration on this network upgrade? If PG&E is anticipating an acceleration, can PG&E please indicate what is the estimated accelerated in-service date?	**PG&E RESPONSE:** PG&E evaluated whether this upgrade could be accelerated and determined that it is not feasible at this time. There is very limited space available to install the new reactors, and an ongoing bus conversion project is required to create the necessary space for installation. of the reactors.
b	**C14P2-FPN03** **Los Banos 230 kV circuit breakers 212 & 222 overstress** A significant amount of queued generation is dependent on this upgrade to achieve their backfeed / in-service dates 1. Why does this upgrade have to be bundled with a larger Los Banos project to replace multiple breakers. That decision appears to be leading to a significant delay to the in-service date from Sept 2027 to Dec 2028. Can PG&E please evaluate whether this upgrade can be returned to its original schedule or an alternate accelerated schedule?	**PG&E RESPONSE:** The existing bus infrastructure at Los Banos could not support the installation of the new breaker sizes required to address the overstress condition. As a result, a bus upgrade was required as part of the overall breaker replacement effort. There are four overstressed breakers among the overall configuration that affect Generation Interconnection projects, and those breakers are being prioritized first in the sequencing of facilities coming online.

		PG&E also notes that the earliest contractual need-by date associated with this upgrade is Q3 2029. The current December 2028 in-service date addresses the upgrade in advance of existing contractual commitments.
c	2223-P-17 **Serrano-Alberhill-Valley 500 kV 1 Line Upgrade** The anticipated in-service date for the completion of the Alberhill 500kV substation and the connection to SCE is anticipated in Q4 2029 (https://www.sce.com/about-sce/reliability/projects-in-progress/alberhill-system-project) 1. Why does the construction of the Serrano-Alberhill-Valley upgrade have to wait until Aug 2030 to start? 2. How can it be started earlier?	**SCE RESPONSE:** 1. Construction start is dependent on the vendor's production schedule and delivery of major materials. The current estimated date for full delivery of 500 kV GIS equipment is July 2030. 2. Starting construction earlier would require an accelerated delivery of major materials by the vendor, which is beyond SCE's control.

5. CPUC Energy Division Staff		
No	**Comment Submitted**	**Responses**
a	In the January 2026 TDF, PG&E presented on GIP C13P1-KPN03 Midway 230 kV Bus D BAAH Conversion. The last update was that key activities at Midway Sub and Midway Kern Lines #3 and #4 must be completed in 2026 to maintain the in-service date. Can PG&E provide updates on those key activities and whether their timelines will affect the Conversion's in-service date (ISD)?	**PG&E RESPONSE:** PG&E confirms that the key activities at Midway Substation and on Midway-Kern Lines #3 and #4, remain on schedule to be completed in 2026. Based on current project execution and milestone tracking, these activities are progressing as planned and do not currently indicate any impact to the Conversation's forecasted in-service date in 2029.
b	Energy Division staff have questions about some of the long-term completion times for several PG&E projects. Energy Division staff would like to know why the projects below have taken so long from being conceptualized (Identified) to their projected ISDs: a. Christie-Sobrante 115 kV Line Reconductor: Why nearly 10 years to complete? b. North Tower 115 kV Looping Project: Why 18 years to complete c. Kern PP 115 kV Reinforcement: Why 18 years to complete? d. Midway-Temblor 115 kV Line Reconductor and voltage support: Why 17 years to complete? e. Coburn – Oil Fields 60 kV system project: Why 14 years? f. Wilson 115 kV Area Reinforcement: Why 20 years? g. Herndon – Bullard 115 kV Reconductoring: Why 10 years? h. Mosher Transmission Project: Why 15 years?	**PG&E RESPONSE:** The duration reflected in these projects is generally attributable to a combination of portfolio prioritization, managing overall costs, and evolving system needs over time. As discussed with Transmission Development Forum participants during the 2022-2023 timeframe, PG&E undertook a prioritization effort of its transmission and infrastructure work portfolio to ensure focus on the highest priority safety work, including wildfire mitigation and hardening programs, emergency response and restoration activities, and other critical system risk reduction work. Changes to PG&E's capital plan were implemented in 2023 and the reprioritization impacted several programs, including transmission line and substation capacity projects. Since that time, PG&E has been able to resume development and execution activities on transmission line and substation capacity projects,

		including the projects identified by CPUC Energy Division staff. Also, starting in approximately 2015, CAISO initiated a re-assessment of all previously approved TPP projects that were still in development, and PG&E awaited the results of that reassessment, which spanned several TPP cycles to fully complete and determine which projects were still necessary. Accordingly, the development durations associated with the Christie-Sobrante 115 kV Line Reconductor, North Tower 115 kV Looping Project, Kern PP 115 kV Reinforcement, Midway-Temblor 115 kV Line Reconductor and Voltage Support, Coburn-Oil Fields 60 kV System Project, Wilson 115 kV Area Reinforcement, Herndon-Bullard 115 kV Reconductoring, and Mosher Transmission Project are largely the result of broader portfolio review, prioritization and funding considerations over time rather than project-specific execution issues.
c	For PG&E project 1415-R-03: Martin 230 kV Bus Extension (a.k.a. Egbert) can PG&E give more information about the nature of the "delay to scope development", and expand on any other delays to this project including delays related to Gas Insulated Switchgear (GIS) procurement or commissioning?	**PG&E RESPONSE:** The current schedule delay is the result of several factors that collectively affected expected in-service date. Most notably, the manufacturer's proposal for the GIS installation was received in June 2026 and identified a longer installation and commissioning duration than had previously been assumed. The manufacturer's scope includes both installation and commissioning activities associated with the GIS equipment.

		The longer installation duration shifted the earliest feasible start of critical outage and clearance activities beyond the available clearance window. After updating the project schedule to reflect the revised installation and commissioning durations, and accounting for applicable clearance restrictions as well as the work that must be performed during those clearances, the overall project schedule increased by approximately 13 months. PG&E notes GIS equipment installations are highly project-specific, and installation and commissioning durations can vary significantly depending on the facility configuration, site conditions, outage constraints, and manufacturer requirements.
d	Energy Division staff have questions about some of the long-term completion times for several SCE projects. Energy Division staff would like to know why the projects below have taken so long from being conceptualized (Identified) to their projected ISDs: a. Lugo Substation install new 500 kV CBs for AA Banks: Why 23 years? b. Lugo-Mohave series capacitor upgrade: Why 12 years c. Method of Service for Wildlife 230/66 kV Substation: Why 22 years? d. Alberhill 500 kV Method of service: Why 20 years?	**SCE RESPONSE:** a. The primary reason for delay of the planned in-service date for this project has been the need to sequence and complete higher priority projects that require 500kV outages in the area. Because many of the previously completed, in-flight, and planned upgrades cannot be done concurrently, this has caused and continues to cause cascading impacts on the overall schedule. SCE sequences and re-prioritizes projects to minimize the need for overlapping engineering, optimize resources, and address dependencies to prioritize safety, operational needs, and minimize costs. The project is currently scheduled to start construction in January 2030 with an operational date of June

		2032. These higher priority projects include the Eldorado-Lugo-Mohave Series Capacitor (ELM) Project, Lugo-Victorville RAS project (LV RAS OPGW), Lugo-Victorville 500 kV Transmission Line Upgrade (LVTO), Lugo Victorville CRAS project, North of Lugo CRAS, and the Lugo 3AA 500/230kV Bank Project. Projects like ELM were delayed for multiple years for reasons including licensing, the pandemic, and procurement issues. While the completion date is noted as June of 2032, SCE is currently moving forward with a strategy to possibly complete this work by the end of 2030. If this earlier date is deemed to be feasible, it will be noted in the following TDF. As it relates to prioritization, the decision was made to begin and complete the Lugo Substation Transformer Bank Conversion (Bank on Breaker) project following the completion of the Lugo 3AA 500/230kV Bank Project. The New Lugo 3AA 500/230kV Bank Project was deemed necessary to be completed first since it will allow for the necessary outages to occur to complete the Bank on Breaker project while maintaining system reliability. Prior to the approval of the Lugo 3AA Bank Project, completing of the Bank on Breaker project would have been a challenge since loss of the remaining Lugo AA Bank would have critical impacts on maintain reliability. b. Following the approval of the Lugo-Mohave series capacitor within the 2013-2014 CAISO Transmission Plan issued in March of 2014, further

		studies were undertaken to complete and finalize the design of the series capacitors followed by siting activities to determine the location of the series capacitors that were to be incorporated into the licensing documentation. While the original scope of work identified the series capacitors to be located at the terminal ends, the subsequent studies identified the need the mid-line series capacitors. Once these studies and activities were completed in 2016, activities began toward the development of the Abandoned Plant Incentive which was submitted in April of 2017 the Permit to Construct which was submitted in May of 2018. In January of 2019, the Commission ordered SCE to file an Amended Application and to refile as a CPCN. With the Amended Application for a CPCN submitted by SCE in April of 2019, the Final Decision which approved the Project was issued in August of 2020. While construction began in November of 2020, several aspects of the Project were held up by suspension notices due to the new administration at the time and multiple approvals that were still required by the local federal agencies including the BLM and the CDFW. Subsequent delays were caused by the COVID pandemic which also resulted in material delays which significantly impacted the overall schedule through the end of 2023. Subsequent construction challenges with completing the series capacitors in addition to delays with completing associated work that involved placing mitigation measures to

		protect a So Cal Gas pipeline which parallelled the Project further delayed the schedule. While SCE completed the construction of the overall series capacitor project in May of 2025, the mitigation measures associated with the So Cal Gas pipeline Project were completed in April of 2026 which marked the official completion date of the Project. c. The Wildlife project was subject to a series of legal and regulatory challenges that introduced significant delays to the project life cycle. Below is a summary of the project's history, the nature of the challenges, and SCE's responses: • **2006:** CAISO directed development of a new transmission line to support Riverside-area reliability needs. • **2009:** SCE entered into an interconnection facilities agreement with the City of Riverside for a new interconnection project. • **August 2011:** Riverside, serving as the CEQA lead agency because it also was going to construct portions of the overall project, released the Draft Environmental Impact Report (EIR) for public review. • **February 2013:** Riverside City Council approved its portion of the project and certified the EIR for both its portion and SCE's. • **2013–2015:** Project opponents challenged the CEQA review in court. The legal challenges were resolved in 2015. However, during the intervening

		period, residential development projects had been entitled and commenced construction along portions of the approved route, so SCE considered a revised "hybrid" project that proposed a mix of overhead and underground construction. • **April 2015:** SCE filed an application for a Certificate of Public Convenience and Necessity (CPCN) application with the CPUC as the CEQA litigation had advanced. • **2015–2020:** The CPUC process extended over approximately five years. as the CPUC determined the changes along the project route required supplemental CEQA review to evaluate routing impacts, including areas where new homes were being built, and ultimately considered additional alternatives. • **March 2020:** The CPUC issued a CPCN authorizing SCE to construct a hybrid project (partially overhead and partially underground). • **2020–2023:** SCE negotiated with Jurupa Valley for priority easements in city streets for underground portions of the work (acquiring a priority easement was a condition of the approved CPCN). Then, the Riverside City Council began new discussions about whether to proceed with the approved design or consider supporting modifications to SCE's portion so as to provide for additional undergrounding within Riverside. Therefore, SCE paused work and significant expenditures pending resolution of Riverside's deliberations.

		• **October 2023:** The City of Norco filed a Petition for Modification (PFM) seeking additional undergrounding of the overhead portion of the project. Construction-related work remained paused pending Riverside's discussions as well as resolution of Norco's PFM, to avoid unnecessary ratepayer spending while reconsideration of the project was pending. • **March 2024:** The PFM was dismissed by the CPUC. However, construction-related work remained paused pending Riverside's continuing discussions. • **May 2024:** Riverside City Council voted to recommit to the project as approved under the 2020 CPCN. • **2024–2025:** Following Riverside's recommitment, SCE resumed final design activities and rebid key project components. • **June 2025:** Construction began. d. The Alberhill Project experienced multiple delays in receiving approval of the CPCN application from the CPUC. The first delay was ED directing SCE to combine the Alberhill Project with the separate Fogarty Substation and Valley-Ivyglen projects for CEQA analysis. Then the economic downturn following the housing crisis resulted in the need date of the project being delayed. Within the time that had passed since filing in 2009, field conditions changed, and updates to line routes were required along with updated CEQA analysis. The "no decision" in 2018 directed SCE to do an

		extensive amount of additional analysis which took several years to provide, and then several years for ED to evaluate. A second round of oral testimony was performed and then a final decision approving the project occurred in early 2026.
e	On the Serrano-Alberhill upgrade (item 18 in SCE's TDF presentation): Can SCE confirm that lead time for GIS equipment is causing the project to be delayed? Can SCE provide additional context on procurement issues or other delays impacting the project?	**SCE RESPONSE:** SCE confirms that the lead time for GIS equipment is causing the project to be delayed. The vendor's current estimated delivery date for 500 kV GIS major material is July 2030. SCE conducted an open Request for Proposal process for the Serrano 4AA Bank & 230 kV GIS Rebuild project, seeking bids from any vendor capable of manufacturing GIS switchgear. Several vendors took part in informational meetings and job walks to evaluate the project. Only one vendor was able to submit a viable bid. As such, SCE is dependent on this vendor's production capacity and delivery schedule to begin construction of the project.

6. Longroad Energy		
No	**Comment Submitted**	**Responses**
a	Regarding TPP project ID #1011-R-16 Oro Loma 70 kV Area Reinforcement, we saw PG&E/CAISO added a new "Phase 2" line item for the re-scope addition in the 2025-2026 Transmission Plan. We have a few questions on this project: a. Can PG&E confirm which elements are part of Phase 1 with a May 2028 ISD and what elements are part of Phase 2 with a May 2032 ISD? b. Specifically, can PG&E confirm Phase 1 includes the 10.8 mile reconductor of the Mercy Springs – Canal – Oro Loma 70 kV line from Mercy Springs to Canal, and this line reconductor is still expected to be In-Service by May 2028? What will be the ratings of the reconductored line? c. If a project was assigned the Oro Loma 70 kV Area Reinforcement as a PNU for FCDS, can PG&E/CAISO confirm that Phase 2 is not automatically assumed as a required PNU as well?	**PG&E RESPONSE:** a. The project has been divided into separate phases to reflect the current scope and project sequencing. The following facilities are included in Phase 1, which currently has an expected May 2028 in-service date: • Mercy Springs-Canal Reconductor • Los Banos-Santa Nella Reconductor • Los Banos Substation Upgrade • Canal Substation Upgrade • Santa Nella Substation Upgrade • Mercy Springs Switching Station STA Upgrade The following facility was originally associated with the Oro Loma 70 kV Reinforcement scope but was re-scoped into Phase 2: • Ortiga Substation Upgrade b. PG&E confirms that the Mercy Springs Switching Station-Canal 70 kV reconductoring project remains scheduled for an expected May 2028 in-service date as part of Phase 1. The line is planned to be reconductored using 477 ACSS conductor, resulting in line ratings ranging from approximately 1,126 A summer normal to 1,229 A winter normal. c. PG&E confirms that the Phase 2 scope should not automatically be assumed as a required PNU.

7. City and County of San Francisco		
No	**Comment Submitted**	**Responses**
a	**Martin 230 kV Bus Extension *aka* Egbert 230kV Switching Station** The In-Service Date (ISD) for this project (1415-R-03), approved in the 2014-2015 Transmission Plan with an original in-service date of December 2021, has now moved from the last reported in-service date of October 2028 to December 2029. During the July 29, 2026 TDF meeting, PG&E reported that this additional 13-month slip was attributed to an updated Siemens GIS commissioning duration. This latest change brings the cumulative slip to approximately eight years beyond the project's original in-service date. The City is very concerned about this delay. Following are CCSF questions regarding the status of this critical project: Delay of 13 months due to a vendor update in commissioning duration suggests that the duration of commissioning exceeds 13 months. Please provide the specifics behind the vendor input—including the prior and revised commissioning durations, the date PG&E received the updated schedule, and whether this is a Martin-specific constraint or a fleet-wide Siemens GIS issue affecting other projects.	**PG&E RESPONSE:** The manufacturer's proposal for the GIS installation was received in June 2026 and identified a longer installation and commissioning duration than had previously been assumed. The manufacturer's scope includes both installation and commissioning activities associated with the GIS equipment. The manufacturer's longer installation duration shifted the earliest feasible start of critical outage and clearance activities beyond the available clearance window. After updating the project schedule to reflect the manufacturer's revised installation and commissioning durations, and accounting for applicable clearance restrictions as well as the work that must be performed during those clearances, the overall project schedule increased by approximately 13 months. PG&E notes that this delay is not attributable to a broader fleet-wide GIS issue. GIS equipment installations are highly project-specific, and installation and commissioning durations can vary significantly depending on the facility configuration, site conditions, outage constraints, and manufacturer requirements.
b	Also, the TDF note indicated "scope development" as a cause for delay. Please elaborate on this scope development.	**PG&E RESPONSE:** Effective January 1, 2022, PG&E modified its Civil Standard– Design Criteria Manual (DCM) – Third Party Requirement, requiring the Egbert project engineering

		team to review/modify every foundation to be installed within the switchyard. Any modification may also impact the electric outdoor drawings as well. As a result, the design was modified to meet the 2022 standards. In addition, while the Egbert project was on hold, a new project at Jefferson Substation was initiated to upgrade the 230kV Bus, which also includes the relays associated with the Jefferson – Martin 230kV Line. The implementation of that project dictated a scope change at Egbert Switching Station. Lastly, the transmission lines that are part of the project scope are being revised to reflect updated (current) survey information.
c	The July 2026 TDF workbook categorizes the Reason for ISD Change as "Financing" (Delay Resolver: Utility), while the accompanying note and PG&E's verbal explanation cite scope development and a vendor commissioning update. Please reconcile the standardized "Reason for ISD Change from Original Committed Date" categorization with the note and verbal explanation.	**PG&E RESPONSE:** The Reason for ISD Change field in the TDF workbook for CAISO TPP projects was populated based on primary reason for change in ISD included in the May 2026 CPUC TPR project spreadsheet. Since the TDF does not have "Prioritization" as a drop-down option, "Financing" was populated as the closest equivalent. The reason for delay in the notes section of the TDF workbook for CAISO TPP projects only outline the specific reason for the delay relative to the estimated in-service date provided in the prior TDF (*i.e.*, January 2026 TDF).
d	CAISO determined that this project is needed to meet NERC reliability and CAISO planning requirements, in addition to mitigating critical infrastructure vulnerability. Please describe the actions PG&E has taken, and any interim mitigation measures in place, to assure the reliability of the supply to the City until this critical project is completed.	**PG&E RESPONSE:** The original driver for the Egbert 230 kV Switching Station project was an extreme event contingency, which does not require mitigation per the NERC TPL Reliability Standards. Instead, the project stems from the CAISO's

		development of a localized San Francisco-Peninsula Extreme Event Reliability Standard in 2014. The CAISO's standard was developed to address circumstances of extreme events impacting service to San Francisco and the Peninsula, and the Egbert Switching Station project mitigates the extreme event risk identified by CAISO. In the interim period since the potential risk was identified, the CAISO - as part of its 2013-2014 Transmission Plan - approved enhancements that enable the Trans Bay Cable system to have the capability of providing electric power to San Francisco even after an extreme event such as the one that would be mitigated by Egbert. The combination of the enhanced capability of the Trans Bay Cable and PG&E's operational presence increases the region's ability to restore electric service following a widespread outage.
e	During the July 30, 2026 Transmission Project Review (TPR) stakeholder meeting, PG&E indicated that Egbert will now be used as a supply for a large load increase. a. Please provide scope information for the new large load increase, including timing, amount of load, proximity to the Egbert Switching Station site, special supply requirements, etc. b. Please explain whether, and to what extent, accommodating this new large load connection requires any change to the design or scope of the Egbert 230kV switching station as approved by CAISO.	**PG&E RESPONSE:** a. PG&E confirms that Egbert Switching Station is planned to be a supply point for a new large load customer. To accommodate this connection, PG&E will install a new 230 kV underground outlet, including approximately 500 feet of 230 kV underground cable and conduit routed from Egbert Switching Station to the customer's property line. b. No change to the design or scope of the Egbert 230 kV Switching Station project is required to interconnect the new large load customer. The

	c. Will the new large load customer be charged for the design changes and associated construction required at Egbert to serve this load? d. Could serving this new large load require accelerating construction of the Egbert Switching Station, and if so, how will PG&E accommodate this? e. Please explain how the service to this new large load will impact the project's enhancement of reliability of service to San Francisco. Will the potential new design still enhance the reliability to the City, consistent with the benefits that CAISO identified for the original project?	large load customer project is a separate project, and the customer is responsible for accommodating the new 230 kV lines, including cost responsibility. c. See PG&E's response to (b.) above. No design changes to the Egbert 230 kV Switching Station are required. PG&E's interconnection with the new large load customer will be handled separately, in accordance with its interconnection agreement. d. No acceleration of construction of the Egbert Switching Station is contemplated or anticipated. e. Service to the new large load customer will not impact the Egbert 230kV Switching Station's enhancement of reliability of service to San Francisco.
f	Will additional CPUC permitting approval or environmental review be needed for Egbert as a result of any design or scope changes associated with it? If so, what impact would that have on the project schedule?	**PG&E RESPONSE:** At this time, PG&E is not aware of any design or scope changes that would require additional CPUC permitting approvals or environmental review.

8. New Energy Works Consulting		
No	**Comment Submitted**	**Responses**
a	Re PG&E GI Network Upgrades 24RSMT-GPN01, and C14P1-GGR09 (collectively, Tesla 230 and 500 kV bus extensions, 230 kV SCD mitigation, and associated T line work). Although the current In Service Date (ISD) of April 2031 is not a change from the prior TDF (January 2026), the note for both projects includes a significant update: "Seismic impact to expansion area, evaluating options. In-Service date impacts are not conclusive." On the call PG&E representatives indicated that information was being collected and that PG&E expects to have more information in the time frame of this TDF comment-response cycle. Specifically, PG&E indicated that a new location had been identified for the 230 kV bus extension that avoids certain areas that are now unacceptable due to seismic risks. Whether that new location would allow the extended buses to remain open air or require GIS was also under re-evaluation. a. Please provide an update on the scope of these projects and whether a change in the current ISD is required or likely. Please note that C14 projects that have cost responsibility for these upgrades all have signed GIAs and are actively negotiating offtake agreements. A change in the ISD of these upgrades may materially impact these negotiations. b. Will changes in scope create a change in cost that will impact C14 generators in the 2026 reassessment? c. Multiple C15 projects have POIs at the Tesla 230 kV yard, as expanded. If GIS is now required, will this change in	**PG&E RESPONSE:** PG&E appreciates the questions regarding the status of the Tesla-related network upgrades. Responses to the specific questions are provided below. a. PG&E and its contractors are continuing to perform the ongoing seismology assessment to evaluate the feasibility of the original location selected for the 230 kV bus extension. The assessment is currently expected to be completed in October 2026. Following completion of the assessment and review of the findings, PG&E expects to be in a position to determine the preferred configuration, including whether the expansion will utilize AIS or GIS technology, as well as the specific locations for the 230 kV and 500 kV bus expansion facilities. PG&E will provide an update on scope at the next TDF in January 2027. b. Cluster 14 customers associated with these upgrades have applicable cost caps. Accordingly, if PG&E determines that a more expensive scope is necessary based on the outcome of the seismology assessment or resulting design decisions, those customers would not be expected to receive additional cost allocation resulting from such scope changes. c. Cluster 15 projects will already have their applicable cost-capped allocations set by the time the seismology

	scope change that allocated costs assigned to these projects? Will the change be communicated in the facility study or in some other way?	assessment findings are finalized. Therefore, a change in scope should not affect applicable cost-capped allocations assigned to Cluster 15 projects interconnecting at the 230 kV Tesla yard.
b	Re PG&E TPP NU1415-R-03, Martin 230 kV Bus Extension: the latest ISD was moved out 14-months and includes the note "Delay due to scope development. Updated GIS commissioning duration received from Siemens resulted in delay in ISD." Question: is all or just a portion of Martin 230 kV being converted to GIS? If a C16 generator requests to interconnect at Martin 230 kV, will it need to connect to a position within the (new) GIS or will open positions remain available for a C16 gentie termination?	**PG&E RESPONSE:** PG&E understands that the project title may be confusing. While the project is identified as the Martin 230 kV Bus Extension, the scope is actually the development of a new greenfield facility, commonly referred to as the Egbert Switching Station, which is located approximately two miles from the existing Martin Substation. The project does not involve converting any portion of the existing Martin Substation 230 kV yard to GIS. Rather, the GIS equipment is associated with the new Egbert Switching Station facility and its related infrastructure. Accordingly, PG&E does not expect new generation interconnection requests at Martin Substation to be affected by the GIS equipment being installed as part of the Egbert Switching Station project. Generation projects seeking to interconnect at Martin should not be dependent on obtaining positions within the new GIS facility associated with this greenfield project.
c	Re: SCE TPP 2425-R-22 "Serrano 500 kV SCD Mitigation" shows an August 2033 ISD. Before this project was approved as a TPP project, the same NU was identified as a required mitigation in Cluster 14 Phase 2 and the ISD in that study and the 2024	**SCE RESPONSE:** SCE will work with CAISO's Queue Management to issue a Commercial Operation Date (COD) Extension Notification report adjusting the Interconnection Customers' (IC)

	reassessment (i.e. before the project was approved in the TPP) was December 2031 (74-mo beginning early Q4 2025)--20-mo sooner. Multiple C14 projects dependent on this upgrade now have signed GIAs. How will this latest, pushed-out date impact CODs in those executed GIAs?	target dates (In Service Date, Trial Operation Date, and COD) on the assumption that all projects that are dependent on this upgrade will not be permitted to interconnect unless they request a Limited Operation Study (LOS) at least 9 months prior to the approved Synchronizing Date that may allow them to interconnect prior to the in-servicing of Serrano. The LOS would specify whether the ICs may operate their projects at full or partial capacity (curtailment) depending on the system need and operating conditions.