

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Building for the Future Through  
Electric Regional Transmission  
Planning and Cost Allocation**

**Docket No. RM21-17-000**

**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE  
FILINGS**

**I. Introduction**

Pursuant to Rules 212 and 2008(a) of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure,<sup>1</sup> the California Independent System Operator Corporation (CAISO) respectfully files this motion for an extension of time up to and including December 12, 2025 to submit its compliance filings directed by the Commission in its May 13, 2024 Final Rule.<sup>2</sup> This relief is consistent with relief requested in the February 11, 2025 motion filed by the Committee on Regional Electric Power Cooperation (CREPC) 1920 Ad Hoc Committee on behalf of NorthernGrid and WestConnect planning regions. If the Commission grants a longer period of time (*i.e.*, more than six months) for the NorthernGrid and WestConnect planning regions to comply with Order No. 1920/Order No 1920-A, the CAISO requests that the Commission grant the

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008(a).

<sup>2</sup> *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (May 13, 2024) (Order No. 1920), *order on reh'g and clarification*, Order No. 1920-A, 189 FERC ¶ 61,126 (Nov. 21, 2024) (Order No. 1920-A), appeals pending, *Petition for Review, Appalachian Voices v. FERC*, Nos. 24-1650, et al. (4th Cir. July 16, 2024).

CAISO a similar extension of time. This relief will allow the CAISO to coordinate with the NorthernGrid and WestConnect planning regions on the evolution of planning processes under Order No. 1920/Order No. 1920-A across each of the planning regions in the Western Interconnection.

## **II. Background**

On May 13, 2024, the Commission issued Order No. 1920 to revise requirements regarding long-term regional transmission planning and cost allocation. The order requires transmission providers to plan for future grid needs using a longer planning horizon and reconsider cost allocation methodologies, including holding a state engagement period for relevant state entities. The order also includes provisions regarding interregional transmission coordination, with the aim to improve the efficiency and cost-effectiveness of long-term transmission planning across different regions. This will require transmission providers to engage in periodic assessments to identify opportunities for interregional projects and to incorporate greater transparency in the planning process. Specifically, Order No. 1920 describes sharing of information between regions for the purposes of joint evaluation of interregional transmission facilities.<sup>3</sup>

The Commission later issued Order No. 1920-A which, among other changes to Order No. 1920, allows relevant state entities to seek up to an additional six months for the state engagement period related to cost allocation.

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<sup>3</sup> Order No. 1920 at PP 1751 - 1754.

On February 11, 2025, the CREPC 1920 Ad Hoc Committee filed a motion to extend the State Engagement Period for at least six months for both the NorthernGrid and WestConnect Order No. 1000 planning regions, and similarly extend the compliance filing deadline for a similar six months (CREPC Motion). The CREPC Motion describes the complex and time-consuming tasks to be performed as part of the Order No. 1920 state engagement period, including substantial analysis and time required for the relevant state entities to reach agreement on the details of any state agreement process in the Northern Grid and WestConnect planning regions. The CREPC Motion notes that the CREPC 1920 Ad Hoc Committee may request an additional extension later.

The CAISO is advancing its own compliance through engagement with relevant state entities, stakeholders, and other Western planning regions. The CAISO opened an engagement period with relevant state entities that began on November 1, 2024, and it will run through May 1, 2025. On March 13, 2025, the CAISO will host a stakeholder meeting to socialize the CAISO's compliance plan with stakeholders, including anticipated changes to the CAISO's transmission planning process (TPP) to comply with Order No. 1920. Future meetings will discuss tariff language the CAISO intends to submit on compliance. The CAISO is also meeting biweekly with neighboring planning regions – NorthernGrid and WestConnect – on interregional coordination – which builds on the foundational work each entity undertakes in its regional planning process. Aligning compliance timelines will support the type of interregional coordination the Commission seeks because this alignment will allow regions to coordinate planning process

schedules; set up a common framework for inputs, data assumptions, study plans, and milestones; and ensure coordination of stakeholder engagement.

### **III. Request for Relief**

Under Rule 2008 of the Commission's Rules of Practice and Procedure, "the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended."<sup>4</sup> The CAISO requests an extension of time up to and including December 12, 2025 to submit its compliance filings directed by the Commission in its May 13, 2024 Final Rule. This relief is consistent with the relief requested in the February 11, 2025 motion filed by the Committee on Regional Electric Power Cooperation (CREPC) 1920 Ad Hoc Committee on behalf of NorthernGrid and WestConnect planning regions. If the Commission grants a longer period of time (i.e., more than six months) for the NorthernGrid and WestConnect planning regions to comply with Order No. 1920/Order No 1920-A, the CAISO requests that the Commission grant the CAISO a similar extension of time.

Good cause exists to grant the requested extension in this circumstance because it will allow the CAISO to coordinate its interregional transmission planning process with other Western planning regions. The CAISO views the interregional and regional planning processes as inextricably linked, and it seeks to ensure reforms to these processes support its interregional coordination with

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<sup>4</sup> 18 C.F.R. § 385.2008(a).

other Western planning region, and the development of consistent inputs and assumptions, and advance efficient data sharing. Allowing the CAISO to submit its compliance filing on the same timeline at Northern Grid and WestConnect ensures coordination throughout the development of compliance filings and ensures that the CAISO does not prematurely propose a process that may be affected by decisions yet to be made by other Western planning regions.

**A. Proposed Interregional Projects are Inputs into the CAISO's Regional Planning Process.**

The regional planning and interregional coordination processes the CAISO conducts are inextricably linked. The work performed by other planning regions in their interregional processes is a direct input into the CAISO's regional planning processes. Therefore, finalizing any changes to the CAISO regional planning process is difficult until the interregional planning process changes made across the Western planning regions are closer to final.

There is a nexus between the interregional coordination and regional planning processes in the West. Interregional projects submitted into the CAISO's regional planning process may move forward as regional projects if another region does not identify a need for them. Similar to the other planning regions, and starting each even year, the CAISO's interregional transmission coordination process utilizes a two year cycle, aligned with two annual cycles of the CAISO's regional transmission planning process.<sup>5</sup> In the interregional

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<sup>5</sup> By way of example, the CAISO's current interregional transmission coordination process is in the first year of the 2024-2026 cycle, overlapping with the 2024-2025 transmission planning process and the 2025-2026 transmission planning process.

coordination process, project developers submit interregional transmission projects for consideration to the relevant planning regions in quarter one of the first year. The CAISO then studies these project submissions as part of its regional transmission planning process to evaluate whether any of the submitted projects can meet a regional need. These projects may meet regional reliability, policy, or economic needs, or any combination of the three. If in this first year, the CAISO determines there is a potential regional or interregional need that the proposed project could meet, the project moves forward into the second year when the CAISO performs a detailed analysis in coordination with the applicable planning region as part of that year's regional transmission planning process.

If the CAISO determines the project meets an identified need, there are two possibilities for the project to move forward: either as an interregional project if it similarly meets a need in another planning region(s), or as a regional project if another planning region(s) does not identify the project as meeting a need. An example of a project moving forward as a regional project that initially was submitted as an interregional project is the North Gila – Imperial Valley 2 project approved in the CAISO's 2022-2023 transmission planning process. This project was submitted to both WestConnect and the CAISO as an interregional project. WestConnect did not have a regional need for this project, but the CAISO's planning region did. Although the CAISO analyzed North Gila – Imperial Valley 2 as an interregional project, it ultimately moved forward as a CAISO regional project.

## **B. Shared Inputs and Assumptions in Interregional Planning Drive Consistent Project Evaluation.**

The CAISO must understand other Western planning regions' process changes and approaches to developing and implementing long-term transmission plans because that understanding fosters better interregional coordination. Such coordination will drive similar consideration of needs and benefits across the region, allowing for the study of possible solutions and outcomes by different regions using the same inputs and assumptions.

As described in the CAISO's existing transmission plans, the intent of the interregional transmission coordination is to achieve consistent planning assumptions and technical data for use in the individual regional evaluations of an interregional transmission project.<sup>6</sup> The common framework, coordinated by the western planning regions provides the basic descriptions, major assumptions, milestones, and key participants in the interregional transmission planning evaluation process. The CAISO then utilizes this information to develop all planning data and information required for the CAISO to assess the interregional transmission projects in its own regional transmission planning process.

The inputs and assumptions used in the CAISO's regional transmission planning process also help inform coordination with the interregional planning processes of other Western entities. The California Public Utilities Commission provides resource portfolios to the CAISO for use in the CAISO's regional transmission planning processes. The resource portfolios in recent years have

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<sup>6</sup> See, 2022-2023 TPP at pg. 126, available at <https://www.caiso.com/documents/iso-board-approved-2022-2023-transmission-plan.pdf>.

included out-of-state resources such as wind from Idaho, Wyoming, and New Mexico, and geothermal from Nevada and Utah. The CAISO evaluates interregional transmission projects submitted into the interregional coordination process as part of its regional transmission planning process to determine if these help enable the CAISO integrate resource portfolios that include out-of-state resources being developed. To the extent that changes directed by Order No. 1920 involve major assumptions – such as resource portfolios used by planning regions – the CAISO seeks to coordinate with the Western planning regions on their compliance to ensure alignment. Should the CAISO file several months earlier than the other Western planning regions, the assumptions and inputs in others' compliance proposals potentially could evolve, creating a misalignment between Western planning regions.

The existing FERC Order No. 1000 processes include significant overlap and dependencies. While the CAISO intends to comply with the Order No. 1920 planning reforms, it does not anticipate that these general dependencies will change. The existing alignment between planning regions' interregional process allows for regions to consider whether beneficial interregional projects may also provide cost-effective solutions in regional planning.

### **C. Timing Alignment of Planning Cycles Results in Efficient Outcomes for Regional Planning and Interregional Coordination.**

Finally, as it regards the timing of planning cycles, the CAISO seeks to ensure both a uniform window for submissions into the interregional process and a similar schedule on which all studies are conducted, both for regional and



interregional projects. During each interregional coordination cycle, the Western planning regions work together on a joint study plan developed by the impacted planning region.<sup>7</sup> The joint study plan results in a common framework to provide basic project descriptions, input assumptions, milestones, and key participants in the evaluation process. Alignment in timing of the development of the study plans results in most efficient outcomes given that it establishes the common framework for use in each of the individual planning regions regional transmission plans.

Similarly, alignment between Western planning regions helps all planning regions provide aligned inputs to Western Electric Coordinating Council (WECC) to develop power flow and production cost model study cases. Aligning processes will ensure interregional coordination takes place on a similar timeframe and utilizes the same WECC-wide data set including system topology, and load and resource projections, as a starting point for further regional and interregional analysis. Allowing the CAISO to coordinate its planning cycle with other Western planning regions will ensure the CAISO, NorthernGrid and WestConnect can incorporate the most up-to-date and final changes within their processes.

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<sup>7</sup> See, for example, <https://www.caiso.com/documents/2024-gallatin-power-interregional-transmission-project-evaluation-plan.pdf>.

#### IV. Conclusion

For the reasons stated above, the CAISO requests that the Commission extend the CAISO's compliance filing deadlines under Order Nos. 1920 and 1920-A up to and including December 12, 2025, or to a date that aligns with any extension granted for the NorthernGrid and WestConnect planning regions.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 12th day of March, 2025.

/s/ Ariana Rebancos

Ariana Rebancos  
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