



Chair Joe Eto
Vice Chair Mary Leslie
Governor Alice Reynolds
Governor Severin Borenstein
Governor Jan Schori

May 14, 2026

California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

**RE: SVP Comments to the Board of Governors on the 2025-2026 Transmission Plan
Regarding South Bay Projects**

Dear Chair Eto and Governors,

The City of Santa Clara, dba Silicon Valley Power (SVP) supports the timely delivery of reliability-driven transmission upgrades in the South Bay area and does not oppose the projects recommended in the Draft 2025–2026 Transmission Plan (Draft Plan). However, SVP requests targeted direction from the Board of Governors to ensure that material transmission interface reconfigurations affecting SVP’s system are not approved or advanced before appropriate affected-system coordination and evaluation are completed. SVP is concerned with the Draft Plan’s introduction of new reconfigurations and project scope elements in the South Bay area that were not previously disclosed to SVP and were not subject to coordination during the planning cycle. In addition, SVP emphasizes the importance of preserving design and configuration optionality for future SVP transmission projects that may be associated with the San Jose B – Northern Receiving Station 230 kV corridor. Specifically, SVP urges the CAISO to ensure that decisions made in the current planning cycle do not foreclose reasonable future system configurations needed to maintain long-term reliability and operational flexibility on SVP’s system.

On [April 29, 2026, SVP submitted written comments to the CAISO on the Draft 2025–2026 Transmission Plan](#) (Also included as Attachment 1). In those comments, SVP requested that CAISO:

1. Place the South Bay Reinforcement Project (Revised Scope) and the De Anza 115 kV Substation project on hold pending SVP’s evaluation of their impacts on SVP’s system; and
2. Defer action on the Tesla–Trimble–Metcalf 230 kV Corridor Expansion project until that evaluation is complete.

SVP does not oppose approval of these projects, and each may ultimately provide benefits to SVP and the broader South Bay area. SVP’s concern is the process and timing under which these projects were introduced. The Draft Plan includes material, previously undisclosed

reconfigurations of SVP's 115 kV transmission intertie changes that were not subject to prior notice, stakeholder discussion, or Affected System coordination. These reconfigurations, described in Attachment 1, may materially affect SVP's ability to reliably import power under N-1 and N-1-1 conditions, particularly given rapid load growth in the South Bay area.

The CAISO stakeholder timeline provided less than three weeks for review of these newly identified intertie modifications. Given the sensitivity of SVP's system and the potential reliability implications, this period was not sufficient for SVP to conduct the necessary Affected System analysis. This challenge was compounded by the fact that the CAISO-recommended projects were not identified in any prior stakeholder materials or meetings during this Transmission Planning Process (TPP) cycle. SVP engaged with CAISO multiple times throughout the cycle, including direct discussions at CAISO offices, yet these intertie changes were not raised for coordination.

Under these circumstances, approval of projects incorporating unreviewed transmission interface reconfigurations would be premature and inconsistent with established TPP expectations for affected-system coordination.

SVP respectfully requests that the Board of Governors to (i) direct CAISO staff to place the South Bay Reinforcement (Revised Scope) and De Anza 115 kV Substation projects on hold until SVP has completed affected-system evaluation and coordination with CAISO and PG&E, (ii) defer Board approval of the Tesla–Trimble–Metcalf project until that evaluation is complete, given its interaction with the same South Bay transmission interface configurations, and (iii) direct CAISO staff to report back to the Board later in 2026, following completion of affected-system coordination, with a recommendation regarding the appropriate timing and disposition of these projects. SVP anticipates that a focused period of technical study and coordination will be required to assess the impacts of these three CAISO-recommended projects.

SVP appreciates the opportunity to provide these comments and looks forward to working closely with CAISO to address SVP's urgent reliability needs. SVP believes that the limited Board direction requested here will strengthen the integrity of the TPP and reduce the risk of avoidable schedule, cost, or reliability issues during project execution.

Sincerely,

Nico Procos

Nicolas Procos
Utility Director
City of Santa Clara, dba Silicon Valley Power

Cc:

Mr. Elliot Mainzer, President and Chief Executive Officer, CAISO
Mr. Mark Rothleder, Senior Vice President and Chief Operating Officer, CAISO
Mr. Neil Millar, Vice President, Transmission Planning and Infrastructure Development, CAISO
Mr. Jeff Billinton, Director, Transmission Infrastructure Planning, CAISO
Mr. Binaya Shrestha, Manager-North, Transmission Infrastructure Planning, CAISO

Attachment 1: SVP's Comments on the CAISO Draft 2025-2026 Transmission Plan



Submit comment on Draft 2025-2026 Transmission Plan

2025-2026 Transmission planning process

1. Please provide your organization's comments on Reliability-driven Projects Recommended for Approval.

I. Introduction and Requested Action

The City of Santa Clara, dba Silicon Valley Power ("SVP"), submits these comments in response to the California Independent System Operator Corporation ("CAISO") 2025–2026 Draft Transmission Plan ("Draft Plan") and materials presented at the April 15, 2026 stakeholder meeting.

SVP requests that the CAISO:

1. Place the South Bay Reinforcement Project (Revised Scope) and De Anza 115 kV Substation projects on hold pending SVP's evaluation of their impacts on SVP's system; and
2. Defer action on the Tesla–Trimble–Metcalf 230 kV Corridor Expansion project pending completion of that evaluation.

These requests are necessary because the Draft Plan includes material, previously undisclosed reconfigurations of SVP's transmission interties that were not subject to prior notice, discussion, or Affected System coordination.

II. Draft Plan Characterization of Intertie Reconfigurations

The Draft Plan includes transmission projects in the South Bay area that would modify SVP's existing 115 kV transmission interties as follows:

- **NRS–Nortech 115 kV Line:** relocation of the line's terminal point from Nortech Substation to the proposed De Anza 115 kV Substation (De Anza 115 kV Substation project).
- **KRS–FMC 115 kV Line:** relocation of the line's terminal point from FMC Substation to Trimble Substation (South Bay Reinforcement Project – Revised Scope).

These modifications constitute topological reconfiguration of SVP's transmission interface, rather than incremental facility upgrades.

SVP was not notified of these changes prior to issuance of the Draft Plan, and they were not presented or discussed in prior stakeholder materials during this Transmission Planning Process cycle.

III. Reliability Implications

The intertie reconfigurations described above may materially affect SVP's ability to reliably import power under N-1 and N-1-1 contingency conditions, particularly in the context of rapid load growth in the South Bay. The affected facilities represent critical import paths into SVP's system. Relocation of terminal points and associated network reconfiguration may materially alter:

- contingency power flow distribution across the South Bay interface
- thermal loading of SVP import facilities under stressed system conditions
- import capability during peak demand periods
- interaction with existing transmission constraints in SVP's system

SVP previously identified in its October 9, 2025 comments on CAISO's preliminary reliability assessment that key import facilities, including the Newark–NRS 115 kV and NRS–SRS 115 kV lines, exhibit contingency overload sensitivity and are highly dependent on transmission topology. The reconfigurations included in the Draft Plan have not been evaluated in coordination with SVP, despite their direct relevance to these previously identified conditions.

IV. Affected System Coordination and Planning Process Consistency

In prior Transmission Planning Process cycles, CAISO engaged SVP in Affected System coordination when proposed transmission solutions materially impacted SVP interties or import facilities. That coordination enabled SVP to evaluate system impacts prior to project recommendation. No comparable Affected System coordination occurred in this cycle, notwithstanding the inclusion of intertie reconfigurations that directly affect SVP's transmission interface.

As a result, SVP has not had an opportunity to evaluate:

- the reliability impacts of the proposed reconfigurations
- their interaction with SVP's existing constraints
- their effect on import capability under contingency conditions

V. Stakeholder Process Timing and Record Development

The CAISO stakeholder process timeline provided less than three weeks for stakeholder review of newly identified transmission reconfigurations affecting SVP.

This timeframe was insufficient to evaluate:

- N-1 and N-1-1 contingency performance impacts
- topology-driven changes in power flow behavior
- import constraint implications under rapidly growing South Bay load conditions
- interactions with existing South Bay reliability limitations

Given the system sensitivity involved, the stakeholder process timeline did not provide a reasonable opportunity for SVP to perform the necessary Affected System analysis.

This limitation was compounded by the fact that the CAISO-recommended projects were not identified or discussed in any prior stakeholder materials or meetings during this Transmission Planning Process cycle, depriving affected parties of the opportunity to engage earlier in the development of potential solutions. SVP engaged with CAISO multiple times during this planning cycle, including direct discussions at CAISO offices, yet these intertie reconfigurations were not identified or raised for coordination.

Under these circumstances, the stakeholder process did not provide the level of transparency, coordination, or opportunity for meaningful input expected for transmission projects affecting adjacent systems.

Approval of projects incorporating unreviewed transmission interface reconfigurations under these conditions would establish a precedent for advancing material topology changes without affected-system validation, increasing the risk of unanticipated reliability impacts and subsequent need for corrective action.

VI. Requested Action

For the reasons described above, SVP respectfully requests that the CAISO:

1. Place the South Bay Reinforcement Project (Revised Scope) and De Anza 115 kV Substation projects on hold pending Affected System review in coordination with SVP; and
2. Defer action on the Tesla–Trimble–Metcalf 230 kV Corridor Expansion project pending completion of SVP’s evaluation, given its interaction with the same South Bay transmission corridors and the unresolved impacts associated with the intertie reconfigurations described above.

Deferral of the Tesla–Trimble–Metcalf project is necessary to ensure that its effects on SVP’s system are evaluated in conjunction with the proposed intertie reconfigurations, consistent with Transmission Planning Process requirements for coordinated system review.

Deferring approval under these circumstances is consistent with maintaining the integrity of the Transmission Planning Process and ensuring that transmission solutions are based on fully evaluated and coordinated system configurations.

SVP will submit supplemental technical comments following completion of its preliminary system impact assessment.

VII. Conclusion

SVP supports transmission investments that enhance reliability in the South Bay and enable continued economic growth. However, inclusion of material transmission interface reconfigurations without prior identification or Affected System coordination is inconsistent with sound transmission planning practice.

SVP requests that CAISO ensure Affected System coordination is completed prior to further action on the identified projects.

2. Please provide your organization’s comments on Policy-driven Projects Recommended for Approval.

No comment.

3. Please provide your organization’s comments on the Economic Assessment.

No comment.

4. Please provide your organization's comments on Maximum Import Capability Expansion Requests.

No comment.

5. Please provide your organization's comments on Frequency Response.

No comments.

6. Please provide your organization's additional comments on the Draft 2024-2025 Transmission Plan April 15, 2025 stakeholder call discussion.

No comments at this time.