



- Evaluating resource deliverability frameworks, with a particular emphasis on how deliverability is assessed and integrated into resource, transmission planning, and procurement processes.
- Reviewing CAISO studies to assess the capacity the transmission system can reliably support with deliveries from RA-eligible supply resources to the overall CAISO system load.
- Translating technical findings into actionable inputs for the methodology.

#### COMMENTS:

- 1) **Purpose.** The author intends this bill to make enable more California-based clean energy resources to interconnect to the state's electricity grid to meet California's clean energy needs. According to the author:

Today, most of California is functionally off-limits to new renewable energy development due to a lack of interconnection availability caused by transmission constraints. This is especially acute in Northern California, where there is great potential for expansion of wind and geothermal resources...A new approach to grid management can help resolve this problem by allowing vastly more clean energy resources to interconnect to the grid through a smarter approach to grid management. Simply put, California will not reach our ambitious clean energy goals without a better approach to interconnecting new projects to the grid.

- 2) **Background.** The state energy regulators work together in an iterative process to ensure there is enough electricity supplied to the electrical "grid" to satisfy the demand for electrical load. The process is complex, but generally can be summarized as follows:

- The Air Resources Board's Scoping Plan establishes a target range for the electricity sector's greenhouse gas (GHG) emission reductions.
- The CEC's Integrated Energy Policy Report (IEPR) provides a demand forecast to anticipate statewide load in the next decade or longer.
- The CPUC's integrated resource plan (IRP) forecasts system generation resource needs to meet the customer demand forecast by the IEPR 10 years in the future.
- The CPUC's resource adequacy process identifies resources needed to meet customer demand and ensure reliability today.
- CAISO's transmission planning process (TPP) identifies the transmission needs to interconnect and balance the system supply described by the IRP with the customer demand projected by the IEPR.
- The TPP relies on the CPUC's IRP planning targets. CAISO receives the IRP results as inputs into its TPP. The CAISO also considers recommendations from the CEC's IEPR. The plan is updated annually and culminates in a CAISO Board of Governors-approved

transmission plan that identifies the needed transmission solutions and authorizes cost recovery through CAISO transmission rates, subject to federal regulatory approval.

CAISO is considering allowing energy-only resources to count toward RA or storage charging requirements issue as part of the 2026–27 TPP. CAISO expects preliminary results in November 2026, with findings incorporated into a subsequent TPP.

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