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November 21, 2025

Patricia K. Poppe
Chief Executive Officer
Pacific Gas and Electric Company
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Oakland, CA 94612

**Subject: Support for Realization of Generation and Storage Projects via Expediting Required PG&E Interconnection and Transmission Activities**

Dear Ms. Poppe,

In August 2025, Governor Newsom issued Executive Order (EO) N-33-25[1] in response to recently passed federal legislation that removes Inflation Reduction Act (IRA) investment and production tax credits for solar and wind power plants placed in service after December 31, 2027, with limited exemptions for power plants that are, or will soon be, under construction. The EO directs the CPUC to:

- Identify critical generation and storage projects expected to come online in the next three years and request that utilities under its jurisdiction prioritize actions to enable them to interconnect.

- Coordinate with utilities under its jurisdiction and the CAISO to identify priority actions to expedite transmission development that can support the connection of new resources in the next three years.

The actions identified in the EO build on the work I requested PG&E to prioritize in a March 2022 letter. In that letter, I requested PG&E to prioritize actions that continue

[1] See Executive Order N-33-25, available for reference: https://www.gov.ca.gov/wp-content/uploads/2025/08/Clean-Energy-EO_8.29.25_FINAL.SIGNED.pdf.

bringing online new wholesale generation and storage resources in light of the reliability events in 2020 and 2021.[2]

I recognize the important actions that PG&E has already undertaken to address interconnection and transmission challenges in response to my March 2022 letter. For example, PG&E has expanded new equipment vendor relationships to decrease the impact to interconnection projects caused by long lead-time materials and supply chain bottlenecks. But more work is urgently needed to speed up the development and interconnection of key renewable resources and transmission projects at the lowest possible cost for ratepayers.

**Thus, I request that PG&E submit a report to the Commission by January 15, 2026, describing its efforts to expedite interconnection of new resources in 2025 and 2026, and identify process improvements for the transmission and interconnection build out in 2026 and the coming years. PG&E's response should describe whether any actions would interfere with its efforts to reduce costs for ratepayers.**

Attached is a list of in-development wholesale generator interconnection projects in your utility service territory that may be impacted by recent federal action phasing out IRA tax credits. It also includes wholesale storage projects. In your forthcoming report, please describe actions that PG&E is taking to ensure that these projects meet their planned in-service dates, and what actions PG&E is taking to accelerate these in-service dates when appropriate.

This attachment also includes CPUC requested actions for PG&E to take to support wholesale generator and storage development. Your report should describe how PG&E is addressing these requested actions, and describe other actions already taken or underway that will allow PG&E to fulfill its responsibilities related to interconnection, especially as agreed to in existing signed interconnection agreements with developers.

Currently there are over 20,000 MW of additional, new clean energy resources under contract to CPUC-jurisdictional load serving entities – including for PG&E's bundled customers – and these resources are seeking interconnection to the CAISO grid as soon as possible. These new resource additions are essential to meet California's growing electricity demand, maintain grid reliability, and achieve the state's greenhouse gas reduction goals.

These expected new resources are under contract to serve load, but each project needs to also achieve the requisite interconnection, permitting, financing, and

[2] See Prior Letter dated March 2022, available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/summer-2021-reliability/tracking-energy-development/2022-03-11-cpuc-interconnection-letter-to-pge.pdf

construction to successfully come online. If unexpected challenges arise during the interconnection process, there can be significant impacts to the State's energy affordability and clean energy goals. Federal policy changes present an immediate risk to developers seeking to bring projects online and can raise their business costs, which likely will be passed on to California ratepayers.

My ask today is for PG&E to continue work that it has undertaken since I sent the March 2022 letters and to identify how you will continue to bring new wholesale resources online in a timely manner, especially in light of expiring tax credits. This work will build on the collective efforts across the state that allowed California to develop an unprecedented and record-breaking quantity of new clean energy, including over 4,100 new MW interconnecting to PG&E's system[3] since 2020. The successful interconnection of these resources has been essential to enhancing the reliability of California's grid.

Building upon our collective success with interconnecting a record-setting number of clean resources since 2020, I am calling on PG&E to continue prioritizing efforts to support grid reliability in 2026 and 2027, and to accelerate the interconnection of the resources listed in the attachment, especially those that may be able to take advantage of expiring IRA tax credits.

I look forward to the January 15, 2026 report on your continued efforts.

Sincerely,

Alice Busching Reynolds
President
California Public Utilities Commission

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[3] See slide 8: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/summer-2021-reliability/tracking-energy-development/resource-tracking-data-september-2025-releasev2.pdf

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**Attachment: CPUC requested actions for PG&E to take in order to support wholesale generator and storage development via activities related to interconnection and transmission.**

In your response to each of these, identify where addressing would increase cost to ratepayers. Responses should also report on measures PG&E has taken to reduce ratepayer costs in interconnecting new wholesale generation and storage projects.

- **Interconnection Agreements – Report on Process and Timelines**

  Review all signed PG&E interconnection agreements and transmission projects that pose dependencies to interconnection agreements. PG&E should identify what actions it can undertake to facilitate execution of all interconnection projects, especially those with signed interconnection agreements that may be impacted by the phase-out of IRA tax credits. Many of these include solar and wind projects that can start construction by July 4, 2026, or that have the potential to be put in-service by December 31, 2027.

  a. Report to the Commission about actions taken and underway to ensure that these interconnection agreements can be fulfilled and the projects can achieve commercial operation.

  b. Report on the interconnection, and any related transmission timelines, for the current portfolio of projects in PG&E's service territory, including descriptions of key timeline milestones and metrics for success.

  c. Provide information, to the extent available, about process improvements that have been reached for supporting the interconnection of wholesale projects, and their transmission dependencies, seeking to connect to the PG&E system.

- **Staffing and Financial Resources**

  Review PG&E's staffing and financial resources required to support realization of interconnection requests.

  a. Confirm whether staffing resources are sufficient on PG&E's Transmission and Interconnection teams to support the interconnection of new wholesale generation and storage resources.

  b. Identify if there are financial constraints that are limiting the ability of the PG&E to invest in the requisite substation, transmission, or interconnection equipment.

- **Efficient Procurement of Requisite Equipment**

  Review PG&E's ability to procure requisite equipment for interconnection facilities and transmission lines needed for the successful interconnection of new generation and storage assets. Report on whether PG&E experiences delays procuring circuit breakers, transformers, specialized steel structures, and other equipment necessary to support interconnection and transmission upgrades.

  a. Review and report on any proactive efforts PG&E has taken to procure long lead-time equipment necessary for interconnection upgrades and transmission lines to avoid generator and storage project delays.

  b. Review and report on whether PG&E can (and does) work with developers to share project development building activities, including self-build options or self-provision of long lead-time equipment in accordance with utility specifications and utility procurement agreements, to facilitate on-time delivery of interconnection projects and dependent transmission.

- **Timely Construction of Critical Transmission Network Upgrades and Facilitate Interconnection**

  Report on the status of critical transmission upgrades already identified as necessary to support future interconnections, as well as policies PG&E can implement to remove barriers to timely interconnections. It is critical that PG&E identify, track, and deliver delayed transmission projects and network upgrades that will have the highest impact on reliability, and that may prevent large amounts of generation and storage from coming online on time.

  a. Identify and focus on critical transmission upgrades: CPUC staff's 2025 Senate Bill 1174 transmission system assessment is in progress[4] and has found that nearly 8.5 GW of PG&E's expected new generation and storage resources are dependent on PG&E transmission projects and network upgrades that have been delayed. For example, delays to Vaca Dixon Substation 230 kV circuit breaker upgrades are expected to prevent two resources (450 MW) from meeting their in-service dates, and are putting another two resources (900 MW) at risk of delay. It is critical that PG&E identify and focus on the transmission projects and network upgrades that will have the highest impact on reliability and that are preventing large amounts of generation and storage from coming online on time.

  b. Identify whether there are policies that can facilitate generation through sharing utility owned easements in order to help prevent unnecessary project delays due to extended negotiations for greenfield easements from local

[4] https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/summer-2021-reliability/tracking-energy-development

cities, counties and landowners for the interconnection tie lines between the new generation and substation

- **Ongoing Processes to Provide Transparency, Cost Savings, and Efficiency for New Transmission and Interconnection**

  Continue to participate in information and process reform efforts and report to the CPUC whether there are any steps that can be taken to improve these forums to support transparency, cost savings, and efficiency of the interconnection process.

- **List of Projects in PG&E's Interconnection Queue**

  The data listed below reflect a snapshot of LSE-submitted data on projects and developments for current procurement efforts, with a focus on projects expected to reach commercial operation in the near-term. Project ordering does not connote priority in development. Because this list is based on data provided by LSEs, some project information and other projects currently in development may be missing. CPUC and the Tracking Energy Development (TED) Task Force request that PG&E increase their focus on these projects, as well as others PG&E knows to be in-development in its service territory, and look for opportunities to accelerate the in-service dates of projects when appropriate:

| Project Name | Queue Position | Resource Type | Nameplate MWs |
|---|---|---|---|
| North Fork Community Power | 2007-RD | Biomass/Biogas | 2 |
| Sandrini BESS | Q1397 | Storage | 92 |
| Ranch Sereno | 2597-WD | Solar | 3 |
| Hummingbird | Q1454 | Storage | 75 |
| Redemeyer Solar | 3086-WD | Solar | 4 |
| Redemeyer Storage | 3086-WD | Storage | 4 |
| Angela | Q1443 | Solar and Storage | 60 |
| Godinho Dairy Digester | 3281-RD | Biomass/Biogas | 2 |
| American Canyon RV Boat Storage | 3547-RD | Solar | 2 |
| Tesoro Commons LLC | 3098-WD | Solar | 3 |
| Noosa Energy Storage | Q1557 | Storage | 99 |
| Gateway Solar RV and Boat Storage | 3238-RD | Solar | 3 |
| Stellar Wright BESS LLC | Q779 | Storage | 80 |
| Conflitti Solar | 2226-WD | Solar | 4 |
| Gonzaga Wind Farm | Q1378 | Wind | 76 |
| Alpaugh | Q1143 | Storage | 10 |

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|---|---|---|---|
| Chalan Solar | Q1495 | Solar and Storage | 90 |
| Althea Avenue Solar Phase I | 3170-WD | Solar | 5 |
| Althea Avenue Solar Phase II | 3179-WD | Solar | 4 |
| 4Gibson Solar | 2595-WD | Solar and Storage | 26 |
| Flying Goose Deuce | 3497-WD | Solar | 3 |
| Redux Solar (San Luis West) | Q1389 | Solar and Storage | 156 |
| Blue Mountain Electric Company | 2008-RD | Biomass/Biogas | 3 |
| Engeman SVRC Green Energy | 3507-RD | Biomass/Biogas | 3 |
| Key Storage | Q1479 | Storage | 300 |
| Gonzaga Hybrid | Q1718 | Wind and Storage | 115 |
| Aramis | Q1349 | Solar and Storage | 200 |
| Scarlet III BESS | Q1135 | Storage | 160 |
| Jasmine Solar | Q1499 | Solar and Storage | 134 |
| Janus | Q1455 | Solar and Storage | 160 |
| Zeta | Q1728 | Solar and Storage | 150 |
| Tracy Modification Request | Q268 Q606 | Storage | 80 |
| Saloon Energy Storage | Q1444 | Storage | 150 |
| Cormorant | Q1552 | Storage | 250 |
| Kyan | Q1260 | Solar | 100 |
| Midway BESS | Q54 | Storage | 120 |
| Corby | Q1270 | Storage | 300 |
| Twin Pines Solar | 3086-WD | Solar | 5 |
| 5Las Camas 1 | Q1382 | Solar and Storage | 200 |
| Las Camas 3 | Q1456 | Solar and Storage | 200 |
| Sonrisa | Q1391 | Solar and Storage | 384 |
| Pelicans Jaw | Q1593 | Solar and Storage | 1000 |
| Fountain Wind | Q1106 | Wind | 205 |
| Rosemary | Q1709 | Solar and Storage | 140 |
| Potentia-Viridi | Q1702 | Storage | 400 |
| Denali Energy Storage | Q1690 | Storage | 93 |
| Lock Storage | Q1962 | Solar and Storage | 1000 |
| Buttonbush 1 | Q1596 | Solar and Storage | 1600 |
| GARDEN GREEN, VCI ENERGY INC | Q2358 | Solar and Storage | 100 |
| Spikes Peak Solar | Q1958 | Solar and Storage | 316 |
| Baylands (Mission Blue) | Q1900 | Storage | 250 |
| Cornucopia | Q1959 | Solar and Storage | 600 |
| Allium Hybrid | Q1921 | Solar and Storage | 224 |