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Steven D. Powell
President and Chief Executive Officer
Southern California Edison
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Subject: Support for Realization of Generation and Storage Projects via Expediting Required SCE Interconnection and Transmission Activities

Dear Mr. Powell,

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 SCE to prioritize in a March 2022 letter. In that letter, I requested SCE 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 SCE has already undertaken to address interconnection and transmission challenges in response to my March 2022 letter. For example, SCE has initiated a 5-year forecast approach to strategically procure critical long lead-time materials such as power transformers and circuit breakers. 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 SCE 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. SCE'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 SCE is taking to ensure that these projects meet their planned in-service dates, and what actions SCE is taking to accelerate these in-service dates when appropriate.

This attachment also includes CPUC requested actions for SCE to take to support wholesale generator and storage development. Your report should describe how SCE is addressing these requested actions, and describe other actions already taken or underway that will allow SCE 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 SCE'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.

[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-sce.pdf

These expected new resources are under contract to serve load, but each project needs to also achieve the requisite interconnection, permitting, financing, and 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 SCE 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 11,300 new MW interconnecting to SCE'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 SCE 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 SCE 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 you have taken to reduce ratepayer costs in interconnecting new wholesale generation and storage projects.

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

  Review all signed SCE interconnection agreements and transmission projects that pose dependencies to interconnection agreements. SCE 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 SCE'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 system.

- **Staffing and Financial Resources**

  Review SCE's staffing and financial resources required to support realization of interconnection requests.

  a. Confirm whether staffing resources are sufficient on SCE'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 SCE to invest in the requisite substation, transmission, or interconnection equipment.

- **Efficient Procurement of Requisite Equipment**

  Review SCE'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 SCE 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 SCE 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 SCE 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 SCE can implement to remove barriers to timely interconnections. It is critical that SCE 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 prioritize critical transmission upgrades: CPUC staff's 2025 Senate Bill 1174 transmission system assessment[4] found that over 13 GW of SCE's expected new generation and storage resources are dependent on SCE transmission projects and network upgrades that have been delayed. For example, there are over 2.5 GW of in-development resources that are projected to be delayed because of ongoing delays to Lugo-Victorville 500 kV line upgrades. It is critical that SCE identify and prioritize 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 SCE'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 SCE increase their focus on these projects, as well as others SCE 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
Shirk Road	WDT1650	Storage	80
Gettysburg Solar Farm, LLC	WDT1380	Solar	20
Organic Energy Solutions	NA (GFID 8566) Rule 21 App	biomass/biogas	2.6
Rexford	Q1516	Solar and Storage	540
Painter Energy Storage, LLC	WDT1539	Storage	10
Deer Creek Solar 1	WDT1384	Solar and Storage	100
Gaskell West	Q1074	Storage	61.6
Athos Storage	Q1405	Storage	402
Silver Peak Solar (Tahoe 1-4)	Q1339	Storage	300
Wallace Energy Storage	WDT1754	Storage	55
Commerce Phase 1	Q1611	Storage	250
Willow Springs 3 (Tumbleweed 1)	Q1076	Storage	50
Willow Springs 4 (Tumbleweed 2)	Q1217	Storage	75
Aratina 1	Q1604	Solar and Storage	400
Lockhart Solar 3 (Desert Breeze)	Q1617 Q1775	Solar	125
Aratina 2	Q1604	Solar and Storage	400

RPCA Solar 13	WDT1806	Solar	14
RPCA Solar 15	WDT1813	Solar	9.99
RPCA Solar 12	WDT1938	Solar	4.99
Trestles	WDT1559	Storage	150
Baldy Storage	Q1413 Q1519	Storage	50
Windhub Solar B	WDT1515	Solar	20
Solar Star 3	Q1322	Solar	47
Solar Star 4	Q1323	Solar	47
Westminster	WDT1816	Storage	110
Atlas 5-10	Q1402	Storage	1998
Homestead	WDT1710	Storage	15
Rosamond South 2 (Golden Fields)	Q1212	Storage	92
Bellefield 2	Q1631	Solar and Storage	1000
Pastoria	Q1335	Solar and Storage	185
Atlas South	Q1402	Solar	200
Humidor	Q1629	Storage	300
Easley	Q2042	Solar and Storage	1000
Sienna 1	Q1207	Solar and Storage	400
Overnight Solar	Q1774	Solar and Storage	300
Chiquito Grid	WDT1635	Storage	80
Pier S Energy Storage	WDT1683	Storage	70
Shoals	Q1783	Storage	400
Delamar Energy Storage	Q1796	Storage	250
Marici Storage	Q2116	Storage	400
Gateway Energy Storage	Q1170	Storage	325
Grace Orchard Energy Center	Q1761	Solar and Storage	290
Grace Orchard Solar 2	Q1761	Solar	210
Roadhouse	Q1768	Storage	300
Sanborn Hybrid 3 (Enterprise & Discovery Solar)	Q1632	Solar	1400
Gabriel	Q2113	Storage	400
Antelope Solar 2 (Antex2 Expansion)	Q1208	Storage	24
Avocet Storage	Q1608	Storage	200
Atlas North 1	Q1402	Solar and Storage	600
Atlas North 2	Q1402	Solar and Storage	600
VERO Geothermal	GIA-2019-57	Geothermal	18.4
Angeleno Solar Farm (Prairie Song)	Q1625	Solar and Storage	2300

Sapphire	Q1764	Solar and Storage	234
Humboldt House	NV Energy interconnect	Geothermal	20
Willow Rock Energy Storage Center	Q1782	Storage	600
Dirac	Q2114	Storage	400
Euismod Energy Storage	Q2055	Solar and Storage	1200
J90 ENERGY STORAGE	Q2359	Storage	250
Keyhole Wind	Q1784	Wind	100
Redonda	Q2036	Solar and Storage	500
Trolley	Q2032	Storage	400
Bonanza Peak 1	Q1798	Solar	400
Argenta	Q2212	Solar and Storage	600
Simon	Q2115	Storage	400