



PUBLIC UTILITIES COMMISSION

STATE OF CALIFORNIA

505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

300 CAPITOL MALL | SACRAMENTO, CALIFORNIA 95814

ALICE BUSCHING REYNOLDS  
PRESIDENT

TEL: (415) 703-3700  
FAX: (415) 703-3352  
ALICE.REYNOLDS@CPUC.CA.GOV

November 21, 2025

Caroline Winn  
Chief Executive Officer  
San Diego Gas & Electric Company  
8362 Century Park Ct.  
San Diego, CA 92123

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

Dear Ms. Winn,

In August 2025, Governor Newsom issued Executive Order (EO) N-33-25<sup>1</sup> 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 SDG&E to prioritize in a March 2022 letter. In that letter, I requested SDG&E to prioritize actions that continue

---

<sup>1</sup> 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](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.<sup>2</sup>

I recognize the important actions that SDG&E has already undertaken to address interconnection and transmission challenges in response to my March 2022 letter. For example, SDG&E has tracked generation interconnection status on a monthly and quarterly basis in internal meetings, including director-level leadership. 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 SDG&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. SDG&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 SDG&E is taking to ensure that these projects meet their planned in-service dates, and what actions SDG&E is taking to accelerate these in-service dates when appropriate.

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

---

<sup>2</sup> 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/22-03-11-cpuc-interconnection-letter-to-sdge.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 SDG&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 1,500 new MW interconnecting to SDG&E's system<sup>3</sup> 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 SDG&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

CC:

Matthew Baker, CPUC Commissioner, [matthew.baker@cpuc.ca.gov](mailto:matthew.baker@cpuc.ca.gov)

Karen Douglas, CPUC Commissioner, [karen.douglas@cpuc.ca.gov](mailto:karen.douglas@cpuc.ca.gov)

Darcie L. Houck, CPUC Commissioner, [darcie.houck@cpuc.ca.gov](mailto:darcie.houck@cpuc.ca.gov)

John Reynolds, CPUC Commissioner, [john.reynolds@cpuc.ca.gov](mailto:john.reynolds@cpuc.ca.gov)

David Hochschild, California Energy Commission, Chair,

[Chair.Hochschild@energy.ca.gov](mailto:Chair.Hochschild@energy.ca.gov)

---

<sup>3</sup> 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>

Siva Gunda, California Energy Commissioner, [Siva.Gunda@energy.ca.gov](mailto:Siva.Gunda@energy.ca.gov)

Elliot Mainzer, California Independent System Operator, CEO, [eemainzer@caiso.com](mailto:eemainzer@caiso.com)

Leuwam Tesfai, CPUC, Deputy Executive Director for Energy and Climate Policy,

[leuwam.tesfai@cpuc.ca.gov](mailto:leuwam.tesfai@cpuc.ca.gov)

Rohimah Moly, Governor's Office of Business Development (GO-Biz), Deputy Director

[Rohimah.Moly@gobiz.ca.gov](mailto:Rohimah.Moly@gobiz.ca.gov)

Dee Dee Myers, Governor's Office of Business Development (GO-Biz) Director,

[Deedee.myers@gobiz.ca.gov](mailto:Deedee.myers@gobiz.ca.gov)

**Attachment: CPUC requested actions for SDG&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 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 SDG&E interconnection agreements and transmission projects that pose dependencies to interconnection agreements. SDG&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 SDG&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 SDG&E system.

- **Staffing and Financial Resources**

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

- a. Confirm whether staffing resources are sufficient on SDG&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 SDG&E to invest in the requisite substation, transmission, or interconnection equipment.

- **Efficient Procurement of Requisite Equipment**

Review SDG&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 SDG&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 SDG&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 SDG&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 SDG&E can implement to remove barriers to timely interconnections. It is critical that SDG&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. While SDG&E reported no delayed transmission projects or network upgrades in its 2025 Senate Bill 1174 data submission to the CPUC<sup>4</sup>, SDG&E's submission to the [July 2025 Transmission Development Forum](https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/summer-2021-reliability/tracking-energy-development) showed several approved transmission projects in the planning and design phases with delayed in-service dates. SDG&E is required to report on these transmission projects via the SB 1174 process, including explaining the sources for delays such as permitting or equipment delays.
- 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

---

<sup>4</sup> [Tracking Energy Development https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/summer-2021-reliability/tracking-energy-development](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 SDG&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 SDG&E increase their focus on these projects, as well as others SDG&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
UOS -Fallbrook 2 Energy Storage	Q1169	Storage	30
Ventasso Energy Storage	Q1662	Storage	50
Nighthawk	Q1673	Storage	300
North Johnson Energy Center	Q1047	Storage	50
Chula Vista Energy Center 2	Q1045	Storage	50
Kettle Solar One (Jacumba Valley Ranch)	Q1532	Solar and Storage	180
Camp Pendelton	WDT164	Storage	6
Empire II Starlight	Q1432	Solar and Storage	37.4
Yellow Pine 3	Q1654	Solar and Storage	325
Kingsley (Big Rock 2)	Q1665	Solar and Storage	299
Compass (Captiva) Energy Storage	Q1806	Storage	250
Vulcan	Q1534	Solar and Storage	254