



California Wind Energy Association

May 11, 2026

Elliot Mainzer
President and Chief Executive Officer
California Independent System Operator
250 Outcropping Way
Folsom CA 95630

Transmitted electronically

Re: 2025-26 Transmission Plan & CAISO's Non-Transparent Policy on "Long Lead Time" Resources

Dear President Mainzer,

A provision in the draft 2025-26 Transmission Plan, if adopted, would seriously impede California wind development. The draft plan categorically excludes in-state wind resources from CAISO's new policy of reserving transmission deliverability capacity for "long lead time" (LLT) resources. This provision must be corrected if California is to achieve its planning goals regarding these resources.

Staff proposes to confer LLT status on out-of-state wind and in-state geothermal resources without ever explaining why these resources deserve LLT treatment while in-state wind resources do not. Staff's decision is also at odds with its own March 3, 2025, IPE Track 3 Updated Final Proposal on the matter.

In the March 3, 2025, document, CAISO staff described the policy as "clear and transparent." CalWEA thought so too, presuming that CAISO would be responsive to the CPUC's February 2025 IRP Decision requesting that CAISO reserve capacity for in-state wind energy resources, among others. Thus, we were surprised when staff proposed excluding in-state wind in the present Transmission Plan. When CalWEA asked for an explanation on CAISO's November 19, 2025, stakeholder call, none was provided, but comments were encouraged. On December 5, 2025, CalWEA provided detailed comments that were never responded to.

CAISO's policy on LLT resources includes numerous references to Local Regulatory Agency input, as well as other references that would support the inclusion of in-state wind. The section appears to give the CPUC, as an LRA, substantial input, if not complete deference, regarding which specific resources qualify as LLT, and nothing suggests that the policy should preclude in-state wind.

Unfortunately, in its 2026 IRP decision, the CPUC defers (inappropriately, in our view) to CAISO's initial implementation of the policy, stating that CAISO did not deem in-state wind to have a long lead time "because its development timeline is similar to other resources and there are already numerous projects in the interconnection queue." Neither of these statements is true, and, in any case, CAISO did not include "number of projects in the queue" as a criterion for conferring LLT status on a resource. CAISO's policy states that LLT resources must be:

- a "long lead-time resource technology" – in-state wind resources use the same technology as out-of-state wind;
- "location-constrained" – in-state wind resources are highly location-constrained; and
- "dependent on policy-approved transmission with explicit guidance to treat the resource as a long lead-time resource from the CPUC" – the CPUC provided such guidance in its February 2025 decision.

The CAISO staff's decision to unilaterally deem in-state wind not an LLT resource contradicts its own policy and was not "clear and transparent" as it described its policy.

In-state wind is no different from out-of-state wind or in-state geothermal in its dependence on transmission deliverability capacity reservation, given the much shorter development lead times and greater siting flexibility of solar and battery resources. The staff's decision will have devastating consequences on the ability to develop in-state wind resources and, thus, to achieve the in-state wind resources included in the CPUC's portfolio.

Therefore, we request that this aspect of the 2025-2026 decision be corrected. We would welcome the opportunity to discuss this matter with you.

Sincerely,



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cc: CAISO Chair Joe Eto
CAISO Vice Chair Mary Leslie
Members of the CAISO Board
CPUC President John Reynolds
