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**SENATE COMMITTEE ON ENERGY, UTILITIES AND  
COMMUNICATIONS**

**Senator Benjamin Allen, Chair  
2025 - 2026 Regular**

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| <b>Bill No:</b>    | AB 2493           | <b>Hearing Date:</b> | 6/30/2026 |
| <b>Author:</b>     | Petrie-Norris     |                      |           |
| <b>Version:</b>    | 4/13/2026 Amended |                      |           |
| <b>Urgency:</b>    | No                | <b>Fiscal:</b>       | Yes       |
| <b>Consultant:</b> | Nidia Bautista    |                      |           |

**SUBJECT:** Electrical corporations: interconnection: transmission: permitting: auditor

**DIGEST:** This bill requires the California Public Utilities Commission (CPUC) to require specific actions to help accelerate interconnection of generating resources to electric transmission lines, including requiring each large electrical corporation to retain an independent third-party auditor to review transmission-and interconnection-related project delays; requires large electrical corporations to begin the permitting process within one year of the adoption of the transmission project in the annual transmission plan; and requires penalties for the failure to meet the requirements of this bill.

**ANALYSIS:**

Existing law:

- 1) Establishes the Federal Energy Regulatory Commission (FERC) has exclusive jurisdiction over the transmission of electricity in interstate commerce and over all facilities for the transmission or sale of electricity in interstate commerce. (Federal Power Act §§201, 205, 206 (16 USC 824, 824d, 824e))
- 2) Establishes and vests the CPUC with regulatory authority over public utilities, including electrical corporations. (Article 12 of the California Constitution)
- 3) Establishes the State Energy Resources Conservation and Development Commission (California Energy Commission (CEC)). Requires the CEC to assess trends in energy consumption and analyze the social, economic, and environmental consequences of trends. (Public Resources Code §25200 *et seq.*)
- 4) Establishes the California Independent System Operator (CAISO) as a nonprofit public benefit corporation and requires it to ensure efficient use and reliable operation of the electrical transmission grid. (Public Utilities Code §345)

- 5) Requires, under the California Global Warming Solutions Act of 2006, the California Air Resources Board (CARB) to adopt a statewide greenhouse gas (GHG) emissions limit. Authorized CARB to include market-based compliance mechanisms to comply with the regulations. (Health and Safety Code §38500 *et seq.*)
- 6) Requires the CPUC, if it determines that the rules, practices, equipment, appliances, facilities, or service of a public utility, or the methods of manufacture, distribution, transmission, storage, or supply used by the public utility, are unjust, unreasonable, unsafe, improper, inadequate, or insufficient, to determine and fix the rules, practices, equipment, appliances, facilities, service, or methods to be observed, furnished, constructed, enforced, or employed. (Public Utilities Code §451)
- 7) Requires the CPUC to direct each electrical corporation to annually prepare a renewable energy procurement plan that includes specified elements to satisfy its obligations under the Renewables Portfolio Standard (RPS), and requires the CPUC, to the extent feasible, to review and adopt the plan as part of the general procurement plan process. (Public Utilities Code §399.13 (a)(1))
- 8) Requires every electrical corporation that owns electrical transmission facilities to annually prepare, as part of the FERC Order 890 process, and submit to the CPUC, a report identifying any electrical transmission facility, upgrade, or enhancement that is reasonably necessary to achieve the RPS procurement requirements of this article. Requires each report to look forward at least five years and, to ensure that adequate investments are made in a timely manner, and include a preliminary schedule when an application for a certificate of public convenience and necessity (CPCN) will be made, pursuant to Chapter 5 (commencing with Section 1001), for any electrical transmission facility identified as being reasonably necessary to achieve the renewable energy resources procurement requirements. Requires each electrical corporation that owns electrical transmission facilities shall ensure that project-specific interconnection studies are completed in a timely manner. (Public Utilities Code §399.13 (a)(2)(A))
- 9) Requires each electrical corporation that owns electrical transmission facilities to annually prepare, and submit to the CPUC, a report on any changes to previously reported in-service dates of transmission and interconnection facilities necessary to provide transmission deliverability to eligible renewable energy resources or energy storage resources that have executed interconnection agreements. Requires the report to be provided concurrently with each electrical corporation's annual renewable energy procurement plan and identify the

reason for any changes to the status of in-service dates. (Public Utilities Code §399.13 (a)(2)(B))

- 10) Provides that the CPUC may supervise and regulate every public utility in the state and may do all things, whether specifically designated or in addition, which are necessary and convenient in the exercise of such power and jurisdiction. (Public Utilities Code §701)
- 11) Requires the CPUC to report to the Legislature by November 1 of each year specified information in order to evaluate the progress of the state's electrical corporations in complying with the California RPS Program (Article 16 (commencing with Section 399.11) of Chapter 2.3). This includes a systemwide assessment of delays to interconnection or transmission approvals for eligible renewable energy resources or energy storage resources, based on the annual reports submitted to the CPUC by electrical corporations pursuant to Public Utilities Code §399.13. (Public Utilities Code §913.4)
- 12) Prohibits an electrical corporation from beginning construction of a line, plant, or system, or of any extension thereof, without having first obtained from the CPUC a certificate that the present or future public convenience and necessity requires or will require its construction. (Public Utilities Code §1001)
- 13) Requires the CPUC, in a proceeding evaluating the issuance of a CPCN for a proposed transmission project, to establish a rebuttal presumption with regard to need for a proposed transmission project in favor of CAISO governing-board approved need evaluation if specified conditions are met. (Public Utilities Code §1001.1)

This bill:

- 1) Requires each large electrical corporation, within one year following the adoption of each transmission plan produced by the CAISO through the transmission planning process (TPP), or a successor process, and within one year following the execution of a generator interconnection agreement, that is assigned or obligated to construct a project that requires approval by the CPUC to initiate permitting for the project by filing an application or other notice, as applicable, pursuant to a specific General Order (GO) 131-E.
- 2) Authorizes a large electrical corporation to request an extension of the filing deadline by demonstrating good cause in a written notice to the CPUC, as provided. Requires the CPUC to take appropriate enforcement action, as

specified, if a large electrical corporation fails to adhere to these timelines, or to make a timely extension request.

- 3) Requires the CPUC, beginning January 1, 2027, to require each large electrical corporation, as defined, to retain an independent third-party auditor to review certain transmission- and interconnection-related submissions made by the large electrical corporation, the large electrical corporation's progress on completing network upgrades following approval in a generator interconnection agreement or transmission plan approved by the CAISO, the large electrical corporation's compliance with the above-described permitting deadlines, and the large electrical corporation's compliance with any remedial actions ordered by the CPUC, as specified.
- 4) Requires the third-party auditor to report to the CPUC on an annual basis, as provided.
- 5) Requires the CPUC, within 90 days of receiving the auditor's report, to issue a resolution directing a large electrical corporation to take remedial actions to address any and all deficiencies identified by the auditor, as specified.

## Background

*SB 100/SB 1020 clean energy goals.* With the adoption of SB 100 (De León, Chapter 312, Statutes of 2018) and SB 1020 (Laird, Chapter 361, Statutes of 2022) statute establishes the policy of the state that eligible renewable energy resources and zero-carbon resources supply 90% of all retail sales of electricity to California end-use customers by December 31, 2035, 95% of all retail sales of electricity to California end-use customers by December 31, 2040, 100% of all retail sales of electricity to California end-use customers by December 31, 2045, and 100% of electricity procured to serve all state agencies by December 31, 2035. SB 100 increased the RPS requirement from 50% by 2030 to 60% of retail sales for each retail seller. SB 100 also required CARB, CEC, and CPUC to issue a joint report by January 1, 2021, and at least every four years, that describes technologies, forecasts, affordability, and system and local reliability. The report is required to include an evaluation of costs and benefits to customer rate impacts, as well as barriers to achieving the SB 100 policy. The first Joint Agency report was issued January 2021 and found that in order to meet the state's energy goals California will need to roughly triple its current electricity power capacity.

*CAISO.* The CAISO is a nonprofit public benefit corporation created by California statute as part of the effort to deregulate the electricity market in the late 1990s. The CAISO manages the flow of electricity across the high-voltage bulk power system that makes up 80% of California's, and a small part of Nevada's, electric

grid. CAISO is registered as both a transmission operator and balancing authority (BA) under federal reliability requirements. As with other BAs, the CAISO is regulated by federal statute and regulations with oversight by FERC and the North American Energy Reliability Corporation (NERC).

*Transmission planning process.* Each year, the CAISO conducts its TPP to identify potential system limitations as well as opportunities for system reinforcements that improve reliability and efficiency. The transmission plan fulfills the CAISO's core responsibility to identify and plan the development of solutions, transmission or otherwise, to meet the future needs of the electricity grid. The CAISO Transmission Plan provides a comprehensive evaluation of the CAISO transmission grid to address grid reliability requirements, identify upgrades needed to successfully meet California's policy goals, and explore projects that can bring economic benefits to consumers. The plan relies heavily on key inputs from state agencies in translating legislative policy into actionable policy driven inputs. The development of the transmission plan entails annual public stakeholder process that is conducted pursuant to the CAISO's FERC-approved tariff. It includes a three-phase process that leads to annual CAISO Board of Governor approval of transmission plan and associated transmission projects. The plan is prepared in the larger context of supporting important energy and environmental policies while maintaining reliability through a resilient electric system.

There are three main categories of CAISO approved transmission projects:

- Reliability projects to meet federal standards.
- Policy projects to meet state policy goals (i.e., renewable portfolio standard).
- Economic projects that reduce congestion, production costs, transmission losses, capacity requirements or other electric supply costs.

Additionally, there are other transmission planning efforts, including local capacity requirements, special studies, interregional transmission project, and others. Transmission owners recover the costs of CAISO-approved projects through the Transmission Access Charge. The transmission owner submits an application to FERC to recover project costs. FERC approves just and reasonable costs and rate of return. CAISO charges transmission customers based on FERC-approved costs.

*Forecasting by CEC and supply-side inputs by CPUC.* The CEC conducts demand forecast that is used to inform several planning processes, including the CAISO's TPP. The demand forecast is often a 10-year (recently 15-year) outlook for electricity and natural gas sales, consumption, and peak and hourly electricity demand. Additionally, the CPUC provides energy resource supply-side inputs,

including an annual resource portfolio, to inform the transmission planning by the CAISO.

*Transmission Development Forum.* The Transmission Development Forum is a recent joint effort between the CAISO and the CPUC to discuss and track Participating Transmission Owners expansion and network upgrade projects and schedules. The Transmission Development Forum creates a single forum to track the status of transmission network upgrade projects that affect generators and all other transmission projects approved in the CAISO's TPP. The effort allows for increased transparency for all stakeholders about transmission projects and enhances accountability of transmission owners by having them explain schedule changes, delays, and address stakeholders' questions.

*Tracking Energy Development (TED) Task Force.* The TED Taskforce is also a recent joint effort of the CPUC, CEC, CAISO, and the Governor's Office of Business and Economic Development (GO-Biz) to track new energy projects under development. According to the CPUC, the objective is to build on the success of ad hoc 2021 efforts to provide energy resource project development support, as appropriate, and identify barriers and mitigation strategies to accelerate energy project development.

*CPUC's GO 131-E.* GO 131-E specifically addresses the procedures to be followed in applications for siting of electric transmission infrastructure. In essence, it implements the requirements of Public Utilities Code §1001. Under GO 131-E, the CPUC has established the criteria that would trigger the need for a permit to build or renovate electrical facilities, including transmission lines and substations. Of the hundreds of major capital electric transmission projects completed in California each year, on average one-two per year may trigger a permit, and thus California Environmental Quality Act (CEQA). Most projects are reviewed through the CPUC's advice letter approval process, which tends to be more simplified and expedient than a full application for a CPCN.

The level of analysis performed by the CPUC varies with the size (measured in voltage) of the transmission project.

- Projects below 50 kilovolts (kV) are considered distribution projects, rather than transmission projects, and in general do not require CPUC approval.
- Projects between 50 kV and 200 kV require a Permit to Construct (PTC) from the CPUC, which consists primarily of an environmental review pursuant to CEQA, except for upgrades to substations and switchyards that do not expand land area beyond the existing property. The CPUC process

generally does not require a detailed analysis of the need for or economics of these projects.

- Projects over 200 kV (except for an extension, expansion, upgrade or other modification irrespective if the facility is above 200 kV voltage level) require a CPCN from the CPUC. The CPCN process analyzes the need for the project and the economics of the project, as well as the environmental impacts of the project.

*CAISO 20-year Transmission Outlook.* The CAISO embarked on creating a 20-Year Transmission Outlook for the electric grid, in collaboration with the CPUC and the CEC, with the goal of exploring the longer-term grid requirements and options for meeting California's GHG reduction and renewable energy objectives reliably and cost-effectively. The CAISO also intends for the expanded planning horizon to provide valuable input for resource planning processes conducted by the CPUC and CEC, and to provide a longer-term context and framing of pertinent issues in the CAISO's ongoing annual 10-Year Transmission Plan. The 2024 20-Year Transmission Outlook estimates \$45 to \$65 billion in transmission costs to meet the state clean energy needs, load growth, and offshore wind generation development.

*CAISO reforms of interconnection queue.* The CAISO has also been instituting a number of reforms to address delays, particularly as the volume of projects entering the CAISO queue has grown significantly with the passage of federal legislation by the Biden administration to incentivize clean energy, state procurement directives, resource adequacy requirements, and clean energy targets. The CAISO has implemented a number of reforms through the Interconnection Process Enhancements to modify how projects enter and advance through the queue, including screening and prioritization criteria based on commercial readiness, system need, and project viability.

## Comments

*Need for this bill.* According to the author:

Federal clean energy tax credits worth billions of dollars to California ratepayers are on the verge of expiring, and the single greatest obstacle to capturing those savings is completion of the grid upgrades needed to connect new clean energy projects. The CPUC's own data shows that nearly two-thirds of these transmission upgrades are delayed, with some languishing for over a decade. AB 2493 creates the independent oversight and enforceable accountability mechanisms needed to break through these delays before it is too late.

*Seeking legislative remedies to address delays in infrastructure build-out.* The sponsors and supporters of this bill seek legislative remedies to address delays in interconnecting generating facilities to transmission and distribution grid. They note widespread delays in transmission projects, citing the CPUC's 2025 RPS Report which found that 64% of in-development transmission projects are delayed past their original in-service dates, including Pacific Gas & Electric (PG&E) at 63% and Southern California Edison (SCE) at 70%, though San Diego Gas & Electric was excluded due to incomplete data. They further note that 449 delayed transmission projects with dependent generation or storage is affecting 21.8 gigawatts of clean energy and storage capacity. While they acknowledge there has been much attention to the issue at the CPUC and CAISO, the longstanding delays threaten grid reliability, clean energy progress, and the ability to access the sunseting federal tax credits that can reduce costs for Californians. As such, the supporters seek legislative remedies to require auditing of the electric IOUs' progress to build-out the needed infrastructure, require the IOUs to begin permitting within one year of a transmission project being included in the CAISO adopted TPP, mandatory third-party auditing, remedial action orders by the CPUC, including a reduction of the return on equity within the cost of capital proceeding.

*Electric IOUs oppose the bill singles them out while ignoring other responsible parties and conflicts with existing oversight.* The electric IOUs raise concerns that the bill only focuses on their actions and no other responsible parties. They share that transmission and interconnection projects can often be delayed due to issues outside their control, including a project developer's lack of financing, lack of land rights, or component supply shortages. They also raise concerns that the approved projects in the CAISO TPP are mostly conceptual and often lack critical information that must be prepared prior to determining how (or if) to file for applicable permits. They noted there is extensive work related to engineering, costs, and contracts before the projects can begin the permitting process. They raise concerns that the strict deadlines for submitting requests will result in longer permitting timelines, not shorter.

*This bill's inclusion of an auditor for transmission and interconnection projects mimics SB 254 (Becker, Chapter 119, Statutes of 2025).* SB 254, among other energy provisions, required the CPUC to direct each electrical corporation to retain an independent third-party auditor to review the utility's practices for energizing new customers and planning for demand growth, to evaluate current and future energization performance, and to report to the CPUC on a biannual basis, and authorizes the CPUC to require remedial actions to address deficiencies the auditor identifies. AB 2493's audit and remedial actions proposal for transmission and interconnection projects attempts to mimic the approach in SB 254. Electric investor-owned utilities (IOUs) suggest a more reasonable approach would be to

fund this work through existing public oversight resources (e.g. CPUC staffing) or jointly funded with generation developers. Electric IOUs also raise concerns authorizing the CPUC to require remedial actions and impacts to the cost of capital which they argue would conflate FERC jurisdictional authority for transmission related costs. As this bill proceeds, the author may wish to amend this bill to remove financial assessments on FERC tariffs and instead have the CPUC make recommendations to the CAISO and/or FERC as part of the IOUs' transmission rate cases.

*Balancing the State's build-out goals with affordability.* While the author and supporters are rightfully concerned about the need to ensure the transmission and interconnection delays are addressed, there are valid concerns as to the limitations to effectively legislate the needed build-out. Much of the transmission and interconnection challenge rests with multiple parties, including the management of the interconnection queue at the CAISO, land rights, financing, permitting, and component availability which can all affect the delays to build projects. While electric IOUs and the CPUC are reporting information about transmission projects, as required by SB 1174 (Hertzberg, Chapter 758, Statutes of 2022), the electric IOUs contend the information is still very focused on them and not enough information about the generators and other issues outside the IOUs' control. The proponents cited examples where the costs grew five-fold for a project which led to the electric IOU pivoting away from it after it was approved in the TPP. This seems reasonable, as a least-regrets approach is still necessary to protect ratepayers from undue costs, even as the state moves towards its clean energy goals. In this regard, a reasonable amount of additional time for projects included in the TPP would seem to be more than a year. The author may wish to consider extending the timeline to two years from when a project is included in the TPP and permitting begins. Additionally, the opponents are valid in raising concerns about costs. The author may wish to consider whether a authorizing self-build might lead to unjust costs for ratepayers. Although this bill notes "good cause" as a reason the electric IOU may not meet the deadlines – the one year by when permitting must begin – the bill does not define "good cause." *The author and committee may wish to amend this bill to provide a definition for "good cause" that encompasses causes for delay that are substantially outside the control of the electric IOU.*

### **Prior/Related Legislation**

AB 2111 (Papan, 2026) requires various actions to better incorporate uncertainty and risk in resource portfolio planning to inform transmission planning. The bill requires the CEC and CPUC, in coordination with CAISO, on or before January 1, 2028, to incorporate specified requirements into an update to the Memorandum of Understanding (MOU) regarding transmission and resource planning adopted by

the CEC, CPUC, and CAISO on December 23, 2022, and any related workplan. The bill is pending in the Senate Appropriations Committee.

AB 2369 (Rogers, 2025) requires the CPUC and CEC provide transmission-focused information to the CAISO to identify cost-effective opportunities to increase the reliability contribution or mitigate congestion of planned or existing energy-only resources through transmission capacity expansions. The bill is pending in this committee.

SB 1174 (Hertzberg, Chapter 758, Statutes of 2022) required large electrical corporations that are participating transmission owners to submit annual data on transmission project delays and their impact on RPS-eligible generation and storage, incorporated into the CPUC's annual RPS Report.

SB 529 (Hertzberg, Chapter 357, Statutes of 2022) required the CPUC to update General Order 131-D to allow IOUs to use the Permit to Construct process or claim an exemption for modifications to existing transmission facilities above the 200 kV threshold, to reduce permitting timelines for upgrades to existing infrastructure.

SB 254 (Becker, Chapter 119, Statutes of 2025) among its provisions, established the Transmission Infrastructure Accelerator and required the Go-Biz Energy Unit, in coordination with specified entities, to develop a financing and development strategy for eligible transmission projects, select projects that may receive public financing, and take steps to accelerate transmission development. The bill also required the CPUC to direct each electrical corporation to retain an independent third-party auditor to review the utility's practices for energizing new customers and planning for demand growth, to evaluate current and future energization performance, and to report to the CPUC on a biannual basis, and authorized the CPUC to require remedial actions to address deficiencies the auditor identifies.

AB 2779 (Petrie-Norris, Chapter 741, Statutes of 2024) required the CAISO, upon approval of each transmission plan, to report to the CPUC and the relevant policy committees of the Legislature any new use of grid-enhancing technology deemed reasonable in that plan, and the costs and efficiency savings associated with that technology.

SB 1006 (Padilla, Chapter 597, Statutes of 2024) required electrical corporations to evaluate the use of advanced conductors and grid-enhancing technologies to increase transmission capacity and to report those evaluations to the CAISO.

SB 319 (McGuire, Chapter 390, Statutes of 2023) required specified actions related to electric transmission planning, including: requires a review and update to a

December 2022 MOU and related workplan among California energy agencies and CAISO the development of an electrical transmission infrastructure guidebook; and a report to the Legislature regarding the status of transmission projects.

AB 50 (Wood, Chapter 317, Statutes of 2023) established interim timelines for large electrical corporations to energize customers following a commitment to serve, entitled customers to a bill credit for missed dates, and directed the CPUC to set criteria for timely service.

SB 410 (Becker, Chapter 394, Statutes of 2023) established the Powering Up Californians Act, which required the CPUC to establish reasonable average and maximum target energization time periods, a process for customers to report delays, remedial actions to meet the targets, and independent third-party assessment of each utility's energization performance.

SB 887 (Becker, Chapter 358, Statutes of 2022) among its provisions, required the CPUC, in consultation with the CEC and the CARB, to provide transmission-focused guidance to the CAISO about resource portfolios of expected future renewable energy resources and zero-carbon resources to allow the CAISO to identify and approve transmission facilities needed to allow for full deliverability of those resources to load centers.

SB 100 (De León, Chapter 312, Statutes of 2018) established the 100 Percent Clean Energy Act of 2018, which increased the RPS requirement from 50% by 2030 to 60% and established a state policy that eligible renewable and zero-carbon resources supply 100% of retail electricity sales by December 31, 2045.

SB 350 (De León, Chapter 547, Statutes of 2015) established the Clean Energy and Pollution Reduction Act of 2015, which increased the RPS requirement from 33% to 50% by 2030 and created the integrated resource plan process at the CPUC to ensure long-term electricity planning aligns with the state's GHG reduction targets while maintaining reliability and controlling costs.

**FISCAL EFFECT:** Appropriation: No Fiscal Com.: Yes Local: Yes

**SUPPORT:**

American Clean Power- California (Co-Sponsor)  
Union of Concerned Scientists (Co-Sponsor)  
Advanced Energy United  
California Energy Storage Alliance  
California Environmental Voters  
California Wind Energy Association

Ceres, INC.  
EDF Power Solutions  
ENGIE North America  
Environmental Defense Fund  
Fluence Energy Systems  
Independent Energy Producers Association  
Large-Scale Solar Association  
Natural Resources Defense Council  
Ormat  
Sierra Club California  
Solar Energy Industries Association

**OPPOSITION:**

Pacific Gas and Electric Company  
San Diego Gas and Electric Company  
Southern California Edison

**ARGUMENTS IN SUPPORT:** According to a coalition of organizations, including the co-sponsors of this bill and 14 other organizations listed above:

...California has set an ambitious goal to decarbonize its power grid by 2045. Realizing this goal depends on our ability to connect new clean power generation quickly and affordably. ...Unfortunately, the IOUs are falling behind on those upgrades, delaying the addition of new power to the grid. ...AB 2493 will help stabilize electricity prices and keep California's grid reliable by requiring the large IOUs to connect new clean energy projects faster. First, AB 2493 sets a deadline for the larger IOUs to initiate permitting for major grid upgrades. Second, the bill requires an independent auditor to assess the root causes of interconnection upgrades delays and report findings to the CPUC. ...An independent audit will provide the rigorous, consistent data that state regulators need to understand why projects are falling behind and what remedies will be most effective. Third, AB 2493 requires the large IOUs to develop solutions aligned with the auditor's findings, including facilities advanced equipment procurement to mitigate supply chain constraints, expanding opportunities for entities other than the large IOUs to complete certain upgrades, and implementing a prioritization framework to fast-track upgrades that affect 100 MW or more of clean energy capacity. Finally, the bill directs the CPUC to evaluate the large IOUs' progress in addressing interconnection delays in their rate requests and cost of capital applications.

**ARGUMENTS IN OPPOSITION:** According to PG&E and SCE:

AB 2493 would not address the primary drivers of delays identified in numerous publications and discussed at length in the Assembly Utilities Hearing held on February 18<sup>th</sup>. This include delays related to land rights, procurement lead times, permitting timelines, and customer-driven project design changes. Instead, AB 2493 would (1) create jurisdictional conflicts and competing compliance obligations for utilities by directing corrective actions that may be inconsistent with FERC-jurisdictional requirements and CAISO planning and cost parameters; (2) duplicative existing CPUC and CAISO oversight and reporting frameworks, including the CPUC's Transmission Project Review Process under Resolution E-5252; (3) divert specialized engineering and interconnection staff away from completing studies and executing network upgrades; (4) increase costs for customers without clear, reasonable cost recovery parameters; (5) raise security concerns by requiring public posting of audit reports that could include sensitive critical infrastructure information; and (6) focus on utilities without addressing end-to-end contributors to delay across all responsible parties (utilities, manufacturers, land-owners, developers, and federal, state & local agencies).

**-- END --**