

**SUPPLEMENTAL REGULATORY UPDATE FOR DECEMBER 20, 2024
(WEEK OF DECEMBER 16, 2024)**

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions and Resolutions

None to report.

Voting Meeting

The CPUC held a voting meeting in San Francisco, California on December 19, 2024 at 11:00 a.m. The following are results for energy-related items on the [agenda](#):

Item 3. Resolution (Res) E-5358 (Dynamic Rate Implementation for Vehicle Grid Integration (VGI) Pilot). This Resolution approves the request from Pacific Gas and Electric Company (PG&E) to transfer the \$2.3 million originally requested for the proposed Exploring Export Value Pilot to support implementation of a VGI dynamic rate, pursuant to Res E-5192 and Decision (D.) 20-12-029. This Resolution also approves the implementation of \$20/kilowatt (kW)-year incentive payments for the enrolled load of participating Community Choice Aggregators and authorizes flexibility for PG&E to manage the budget. **Approved.**

Item 15. Application (A.) 23-06-024 (Southern California Gas Company's (SoCalGas) Application for Woody Biomass Pilot Project). This decision grants, with conditions, SoCalGas's request for voluntary dismissal of A.23-06-024 proposing approval of a woody biomass pilot project. By October 1, 2025, SoCalGas is directed to either file a Tier 2 Advice Letter (AL) returning the \$19.704 million of cap-and-trade funds, including interest, to ratepayers through the California Climate Credit in 2026 or file a new woody biomass pilot project application as directed in D.22-02-025. **Signed, D.24-12-032.**

Item 16. Res E-5360 (PG&E, Center for Sustainable Energy, Southern California Edison Company (SCE), and SoCalGas to Change Storage System Sizing in the Self-Generation Incentive Program). The Commission issues this Resolution in response to D.24-03-0711 and the forthcoming opening of the new Residential Solar and Storage Equity budget in the Self-Generation Incentive Program (SGIP). The Resolution replaces the 10 kW load justification threshold with a 15 kW load justification threshold for all storage projects; changes the residential storage system sizing methodology for systems above 15 kW from sizing to peak kW demand in the past 12 months to: sizing storage paired with solar generation to the average daily excess solar generation in a summer calendar month or sizing a standalone storage system to the average daily energy consumption during the 4:00 to 9:00 p.m. peak demand window during a

¹ Per the CPUC's Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.

summer calendar month; institutes a 30 kW incentive cap for all single-family household projects in all residential SGIP budgets; changes the threshold between Small Residential Storage and Large-Scale Storage budgets from 10 kW to 30 kW; and institutes a maximum 60-day pause period in affected SGIP budgets to implement the changes for waitlisted and future SGIP projects. **Approved.**

Item 18. A.24-03-018 (PG&E Revenue Requirement to Support Extended Operations of Diablo Canyon Power Plant). This decision approves PG&E's 2024 Diablo Canyon Power Plant extended operations revenue requirement of \$722.6 million, reducing PG&E's requested revenue requirement of \$761 million by approximately \$38 million, to account for the Tax Gross Up adjustment (\$33.63 million), Fixed Management Fee Escalation adjustment (\$4.737 million), and the Internal Revenue Code Normalization adjustment (\$0.051 million). The revenue requirement is allocated to PG&E, SCE, and San Diego Gas & Electric Company (SDG&E) using the allocation factors 44.9 percent, 45.3 percent, and 9.8 percent, respectively. The investor-owned utilities' joint proposal to establish the Diablo Canyon non-bypassable charge applicable to all Commission jurisdictional customers based on the approved net costs is approved. PG&E's proposal to modify the methodology adopted in D.23-12-036 for allocating resource adequacy attributes and greenhouse gas-free energy attributes is denied, and PG&E's 2025 Volumetric Spending Plan is conditionally approved. **Signed as modified, D.24-12-033.**

Item 19. Res E-5352 (SCE, PG&E, and SDG&E Guidance to Determine Eligibility for Electric Line Extension Subsidies for Mixed-Fuel New Construction Projects). In D.23-12-037 the Commission directed elimination of electric line extension subsidies for mixed-fuel new construction projects and set reporting requirements. The utilities, including SCE, SDG&E, and PG&E, filed ALs seeking guidance stating that they have encountered several issues while implementing the decision, specifically regarding defining the eligibility of electric line extension subsidies for mixed-fuel new construction projects. This Resolution provides clarification and guidance on the concerns shared by the utilities. **Approved.**

Item 21. Rulemaking (R.) 17-07-007 (Interconnection of Distributed Energy Resources and Improvements to Rule 21). This rulemaking was opened on July 21, 2017, to consider refinements to the interconnection of distributed energy resources under Electric Rule 21. Public Utilities Code Section 1701.5 directs the Commission to resolve proceedings within 18 months of the date the proceeding is initiated. The Commission therefore closes this proceeding, and any outstanding motions are denied. The Commission intends to open a new proceeding that focuses on issues affecting interconnection of distributed energy resources under Electric Rule 21. **Signed, D.24-12-034.**

Item 23. R.24-01-017 (2024 Renewables Portfolio Standard Procurement Plans). This decision adopts, with modifications, the Draft 2024 Renewables Portfolio Standard Procurement Plans (RPS Plans) of the LSEs identified in the decision. Any Draft 2024 RPS Plan that does not require a correction or clarification is deemed as final. For the Draft 2024 RPS Plans that require corrections as identified in this decision, the Final 2024 RPS Plans are due no later than 30 days following the issuance of this decision by the Commission. This decision also approves the IOUs' requests to hold solicitations for long-term procurement of RPS-eligible resources. The IOUs are authorized to enter into short-term transactions to procure RPS resources by submitting

contracts and receiving approval through Tier 1 AL process. The IOUs must demonstrate that the contracts are RPS-eligible and that they are either needed to meet RPS needs or necessary for the IOUs to comply with IRP-related orders such as Diablo Canyon Power Plant bridge resource procurement order, D.24-09-006. **Signed, D.24-12-035.**

Item 26. Res E-5355 (SDG&E's Income-Graduated Fixed Charge). This Resolution approves with modifications SDG&E's AL 4492-E, AL 4492-E-A, and AL 4492-E-B to implement an income-graduated fixed charge (IGFC or fixed charge) for residential customers pursuant to D.24-05-028. This Resolution also directs SDG&E to submit a Tier 2 AL within 90 days of the issuance of this Resolution to provide redlined changes to its volumetric rate components of all residential tariffs active in 2025, including legacy rates. In addition, SDG&E is required to submit a Tier 1 AL within 30 days before the fixed charge is implemented to provide final redlined tariffs. **Approved.**

Item 27. Res E-5356 (SCE's IGFC). This Resolution approves with modifications SCE's AL 5358-E and AL 5358-E-A to implement an IGFC for residential customers pursuant to D.24-05-028. This Resolution also directs SCE to submit a Tier 2 AL within 90 days of the issuance of this Resolution to provide redlined changes to its volumetric rate components of all residential tariffs active in 2025, including legacy rates. In addition, SCE is required to submit a Tier 1 AL within 30 days before the fixed charge is implemented to provide final redlined tariffs. **Approved.**

Item 29. A.24-05-009 (PG&E's 2025 Electric Procurement Revenue Requirement Forecasts). This decision adopts the 2025 Energy Resource Recovery Account (ERRA) and related forecasted energy costs and the 2025 electric sales forecast for PG&E. The decision also adopts PG&E's Common Cost allocation proposal, as described herein, and PG&E's 2025 forecast revenue requirements for greenhouse gas (GHG) and climate-related costs. The estimated 12-month net revenue requirement for 2025 is approximately \$2.25 billion, 17 percent less than the adopted 12-month revenue requirement for 2024. As a result of this decision, bundled residential customers' rates will decrease by about 2 percent or 0.7 cents/kilowatt hour (kWh) to a total rate of 34.6 cents/kWh. For residential Direct Access and Community Choice Aggregator customers, generation rates will decrease by about 4.4 percent or 0.9 cents/kWh to a total rate of 19.7 cents/kWh. PG&E forecasts an energy load requirement of 28,655 gigawatt-hours for 2025. This forecast is about 10.6 percent lower than the forecast adopted in PG&E's 2024 ERRA Forecast Application. In contrast to the forecasted decrease in total load, PG&E's 2025 system peak forecast is about 5 percent higher than the 2024 peak forecast adopted in the 2024 ERRA Forecast proceeding. Rate changes do not include the biannual residential California Climate Credit. This decision adopts a 2025 California Climate Credit of \$58.23, a \$3.06 decrease compared to 2024. **Signed, D.24-12-038.**

Item 30. A.24-05-007 (SCE's 2025 Electric Procurement Revenue Requirement Forecasts). This decision approves, with modifications, SCE's 2025 ERRA Forecast and approves a 2025 forecast revenue requirement of \$4.637 billion, representing a decrease of \$442.537 million as compared to the revenue requirement in rates today. As a result of the costs and other adjustments approved in this decision, on January 1, 2025, SCE's system average rates for bundled customers will decrease by approximately 0.1 percent as compared to rates effective

October 1, 2024, to 25.9 cents/kWh in 2024. The Power Charge Indifference Adjustment (PCIA) rates will be negative for most customer vintages and will be negative system-wide in 2025, resulting in credits for customers in most PCIA vintages. This decision approves SCE's forecast GHG costs, including \$436.214 million in GHG cap-and-trade costs. This decision also directs SCE to distribute \$58.183 million to Emissions-Intensive and Trade-Exposed customers and \$583.441 million to residential and small business customers through the California Climate Credit. The semiannual California Climate Credit for residential and small business customers of \$56 per eligible account is approved. **Signed, D.24-12-039.**

Item 31. A.24-05-010 (SDG&E's 2025 Electric Procurement Revenue Requirement Forecasts). This decision approves SDG&E's 2025 ERRRA Forecasts, 2025 Electric Sales Forecast, and GHG Related Forecasts for inclusion in its retail rates effective January 1, 2025. The decision adopts SDG&E's updated 2025 revenue requirement forecast of \$71.7 million, which is \$682.7 million less than its currently effective revenue requirement of \$754.4 million. In total, the adopted revenue requirement is projected to result in a decrease to the current system average bundled rate by approximately 1.7 cents/kWh or 5.2 percent. The decision also adopts SDG&E's Electric Sales Forecast for 2025, GHG Allowance Return Rates, PCIA rates, rate components for the Green Tariff Shared Renewables Program, and Modified Cost Allocation Methodology rates. **Signed, D.24-12-040.**

Item 71. A.22-05-015; A.22-05-016 (SoCalGas's and SDG&E's Consolidated Test Year 2024 General Rate Case). This decision addresses Track 1 of the 2024 Test Year (TY) general rate case (GRC) applications of SDG&E and SoCalGas (jointly Sempra Utilities). The decision adopts a 2024 TY revenue requirement of \$3.805 billion for SoCalGas, which is \$628.658 million lower than the \$4.434 billion that SoCalGas requested. The adopted revenue requirement represents an increase of \$323.634 million or a 9.3 percent increase over the current revenue requirement of \$3.482 billion for 2023. Based on a high-level estimate, it is anticipated that an average residential non-California Alternate Rates for Energy (CARE) customer can expect an average monthly bill increase of \$2.48 or 3.5 percent. An average residential CARE customer can expect an average monthly bill increase of \$1.40 or 3.5 percent. The decision adopts a 2024 TY revenue requirement of \$2.698 billion for SDG&E's combined operations (\$2.192 billion for electric and \$506.062 million for gas operations), which is \$308.313 million lower than the \$3.007 billion that SDG&E requested. The adopted revenue requirement represents an increase of \$188.609 million or a 7.5 percent increase over the current revenue requirement of \$2.510 billion for 2023. Based on a high-level estimate, it is anticipated that a typical SDG&E non-CARE residential electric customer can expect a monthly bill increase of \$4.38 or 2.6 percent, and a CARE residential electric customer can expect a monthly electric bill increase of \$2.85 or 2.7 percent. An average SDG&E non-CARE residential gas customer can expect a monthly bill increase of \$1.02 or 1.8 percent, and a CARE residential gas customer can expect an increase of \$0.71 or 1.8 percent for gas services.

The decision authorizes a base revenue increase (operations and maintenance and capital revenue requirement) of 3 percent each year for 2025, 2026, and 2027. For SoCalGas, the decision adopts a post-test year (PTY) revenue requirement of \$3.995 billion for 2025, \$4.112 billion for 2026, and \$4.232 billion for 2027. For SDG&E, the decision adopts a PTY revenue requirement of \$2.845 billion for 2025, \$2.964 billion for 2026, and \$3.086 billion for 2027. The

balance recorded in SoCalGas's and SDG&E's GRC Revenue Requirement Memorandum Account, from January 1, 2024 until the new tariffs authorized in this decision are implemented, will be amortized in rates over 18 months from the date the new tariffs are implemented.

This decision authorizes funds to underground additional miles of electric lines, but not to the degree requested by SDG&E. Other improvements adopted in this decision include upgrades to natural gas compressor stations, control centers, natural gas leak detection systems, and drones to inspect electric lines. This decision authorizes clean energy innovations that Sempra Utilities demonstrated would benefit ratepayers and be cost effective, but not other innovations, such as using hydrogen, that have not been demonstrated to be directly related to its core function of providing safe and reliable gas service. The decision highlights a pattern of misclassification of costs at Sempra Utilities, where the company has charged ratepayers for lobbying, political activities, and expenses related to outside legal firms. The decision also adopts two settlement agreements, the Insurance and the Customer Services-Information, without modification, and denies the settlement between Sempra Utilities and Cal Advocates on various issues. **Signed, D.24-12-074.**

Item 73. Investigation 17-02-002 (Aliso Canyon Natural Gas Storage Facility Storage Levels to Maintain Energy and Electric Reliability and Just and Reasonable Rates). This decision finds that Aliso Canyon is necessary for natural gas and electric reliability and cost containment until the peak day natural gas demand forecast drops below 4,121 million metric cubic feet per day. To track and evaluate progress toward this natural gas demand threshold and create a concrete pathway for possible incremental reductions in Aliso Canyon inventory levels as natural gas demand declines, this decision adopts a biennial evaluation process beginning in 2025. When the peak day demand forecast for two years out decreases to 4,121 million metric cubic feet per day and the biennial review process shows that Aliso Canyon could be closed without jeopardy to reliability or just and reasonable rates, then the Commission will open an Order Instituting Investigation proceeding to review the conclusions of the biennial assessment, consider issuing any related orders, and address any relevant issues related to permanent closure and decommissioning. **Signed, D.24-12-076.**

Upcoming Workshops and Events

DER Working Group Workshops. As part of Track 2 of the Commission's R.22-11-013 to consider DER Program Cost-Effectiveness Issues, Data Access and Use, and Equipment Performance Standards, the Commission is hosting a series of workshops from August 2024 through January 2025 to convene stakeholders and assess data needs, use cases, and desired delivery tools. This may include examination of data privacy and confidentiality rules, cybersecurity issues, and other issues. These meetings will culminate in a draft and final report with recommendations for the CPUC to consider. The final meeting is scheduled for January 13 from 2:00 to 5:00 p.m. Additional information regarding the DER Working Group is available [here](#), and event registration details are available [here](#).

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

2025 California CAISO Legal Forum. CAISO will host its Legal Forum on Thursday, April 10, 2025, at its headquarters in Folsom, CA. This event provides opportunities for legal professionals from the energy industry to network, discuss current legal topics, gain Minimum Continuing Legal Education credit, and tour the CAISO control room overlook. Further information is available [here](#).

Price Formation Enhancements. CAISO has scheduled a Price Formation Enhancements Phase 2 working group call on January 9, 2025. This session will explore the topic of scarcity pricing. Further information is available [here](#).

2023-2024 Transmission Planning Process. CAISO has validated the project sponsor applications for the Humboldt to Fern Road 500 kV Transmission Line Project. Next, CAISO will consider whether these project sponsors are qualified, and select which qualified project sponsor should finance, construct, own, operate, and maintain each transmission solution. Further information is available [here](#).

Cluster 15 Interconnection Request Queue. CAISO has posted the initial resubmitted Cluster 15 Interconnection Request Queue Report to its website, available [here](#).

2024 Annual Policy Initiatives Roadmap. CAISO has published the 2024 Final Policy Initiatives Roadmap and dispositions of submitted initiatives to its [website](#). The Roadmap describes CAISO's planned policy initiative work plan for 2025-2027, and the dispositions include a description of the outcomes of CAISO's prioritization process for stakeholder submissions to the 2024 Catalog and Roadmap.

California Energy Commission Demand Response Data Request. CAISO provided notice that the California Energy Commission requested confidential demand response (DR) data to support its work related to supply-side DR. Specifically, the data supports: (1) testing proposals under the supply-side DR qualifying capacity working group and determining incremental capacity, (2) calculating incentives under the Demand Side Grid Support program Option 2 incentive for market-integrated DR, and (3) implementing a comparison group-based load impact measurement methodology. This data request includes confidential DR bid, schedule, settlement, and registration data. The due date for any objections to the release of this data is noon on December 26, 2024. Further information is available [here](#).

Cluster 15 Interconnection Request Deposits and Fee. CAISO has posted instructions for the Cluster 15 Interconnection Resubmission Window regarding deposits and fee submissions. CAISO states that following the instructions is critical to ensure that interconnection requests are able to be considered complete and eligible to proceed to the interconnection request scoring and validation processes. Further information is available [here](#).

Interconnection Process Enhancements 2023. CAISO announced that the due date for affidavits seeking to retain Transmission Plan Deliverability (TPD) for the 2025 TPD allocation year will be September 1, 2025, with the results expected to be provided by the end of the first quarter of 2026. The date has been pushed back to 2025 to accommodate the Cluster 15 cluster studies that will begin June 1, 2025. Further information is available [here](#).

2024-2025 Transmission Planning Process. CAISO hosted a public stakeholder meeting on December 9, 2024, to present the Long-Term Local Capacity Requirements Study results. Comments on the stakeholder call discussion are due December 23, 2024. Further information is available [here](#).

Storage Design and Modeling. CAISO launched the Storage Design and Modeling initiative, and hosted a virtual stakeholder working group meeting on December 11, 2024. Written comments are due January 8, 2025. Further information is available [here](#).

CALIFORNIA ENERGY COMMISSION (CEC)

2024 Integrated Energy Policy Report (IEPR) Update

The CEC is working on its 2024 IEPR Update and ongoing workshops are being held through December 2024 to develop the record. The policy recommendations included in the 2024 IEPR Update will be based on the record developed during the proceedings, including data and technical analyses by staff and stakeholders. Upcoming IEPR workshops include the following (note: the [workshop schedule](#) is subject to change):

January 21, 2025: Business meeting to consider adoption of the Electricity Demand Forecast.

January 24, 2025: IEPR Commissioner Hybrid Workshop on Regional Electricity Markets and Coordination.

March 17, 2025: Business meeting to consider adoption of the 2024 IEPR Update.

On November 26, 2024 the CEC [released](#) the [Draft 2024 Integrated Energy Policy Report Update](#) for public comment. Initially comments were due by December 12, 2024, but the CEC has since [extended the public comment deadline](#) to 5:00 p.m. on January 2, 2025.

2025 IEPR

On December 10, 2024, CEC staff held a [webinar](#) to review electricity demand forecasts proposed data collection requirements for the 2025 IEPR.

Demand Analysis Working Group (DAWG)

The CEC noticed a DAWG meeting that will be held on Monday, December 23, 2024 from 10:00 to 11:00 a.m. to discuss updated projections regarding data center load growth. The meeting notice states that, since the November IEPR workshop, utilities have shared new data

center application data and that PG&E, in particular, shows substantially more applications and load than previously projected. The CEC also received updated behind-the-meter solar and storage interconnection data for 2024. The CEC has revised its previous demand scenarios to account for this new data and will present the information at the DAWG meeting. An agenda and meeting materials will be posted in advance on the [DAWG webpage](#). Remote access information is available in the meeting notice, [here](#).

Offshore Wind

The [California Ports and Offshore Wind Symposium](#) (Symposium) will take place on February 21, 2025 at the Port of Long Beach. Topics to be discussed at the Symposium include upgrading ports to achieve offshore wind, climate, and environmental goals; developing the new offshore wind workforce in port communities; and collaborating to improve portside communities. The Symposium is free to attend and registration information is available [here](#).

Power Source Disclosure (PSD) Program

The CEC has issued further revised proposed amendments to the PSD Program, as of December 6, 2024. Comments on the further revised proposed amendments may be submitted to docket 21-OIR-01, available [here](#), through January 3, 2025. Additional information on the 15-Day Notice is available [here](#).

Zero Emissions Vehicles

On December 16, 2024, the CEC held a workshop providing an assessment of EV charging infrastructure deployment pursuant to SB 1000. The presentation outlined the CEC's efforts under the Clean Transportation Program, which was established in 2007 pursuant to AB 118 and extended through July 1, 2035, pursuant to AB 126. The Clean Transportation Program provides approximately \$100 million of funding per year for clean transportation infrastructure through 2035. The Investment Plan sets funding allocations across various categories. The SB 1000 assessment presented by the CEC identifies areas for increased investment in EV charging infrastructure, and provides a comment opportunity through Monday, December 23, 2024. Comments may be submitted to docket [20-TRAN-02](#).

On December 18, 2024, the CEC held a workshop to discuss its revised proposal for reporting on EV charger utilization and IEPR forecasting needs. A copy of the presentation slides is available [here](#). The comment period is open through January 10, 2025, and comments may be filed to docket 22-EVI-04.

On December 19, the CEC announced the availability of up to \$107 million in grant funds under the second solicitation pursuant to California's National Electric Vehicle Infrastructure Formula Program. The grant funds are designed to deploy high-powered, direct-current fast-charging infrastructure for EV travel along major corridors of the state highway

system. A pre-application workshop will be held on January 14, 2025 from 9:00 to 11:00 a.m. Access details are available [here](#).

CEC Business Meetings

The next CEC Business Meeting is scheduled for January 21, 2025.

CALIFORNIA AIR RESOURCES BOARD (CARB)

Meetings and Workshops

On January 7, 2025 and January 13, 2025, CARB will hold virtual Q&A sessions on updates to the [California Climate Investments' benefit assessment tools](#), used by administering agencies and applicants for funding to determine if a project is providing direct benefits to priority populations. Information and registration are available [here](#).

On January 23, 2025, CARB will hold its next [Board meeting](#). The agenda will be available [here](#) 10 days prior to the meeting.

Notices

CARB is soliciting community leaders and racial justice experts to join its Racial Equity Inventory's [Community Partner Workgroup](#), and will hold a [virtual community meeting](#) on the solicitation on January 7, 2025. Applications may be submitted [here](#) by January 13, 2025.

CARB has issued an updated Enforcement Notice for the Advanced Clean Fleets [Regulation](#), available [here](#). CARB is issuing regular updates on Advanced Clean Fleets, with the latest available [here](#). Subscribe here to receive the "Advanced Clean Fleets Flash" [here](#).

The F-Gas Reduction Incentive Program is accepting applications until January 31, 2025 to receive funding to install climate-friendly refrigerant technologies at commercial and industrial facilities. Applications and more information are available [here](#).

The [California Volkswagen Mitigation Trust](#) is accepting applications for funds on a first-come, first-served basis for combustion freight and marine and zero-emission class 8 trucks. Applications for funding are available [here](#).

Opportunities for Public Comment

CARB is accepting public comments on the updated [California Climate Investments benefit assessment tool](#), including strategies to identify priority population needs and potential benefits of a project for priority populations. Comments may be submitted to CARB [here](#) or via email to ggrfprogram@arb.ca.gov through January 17, 2025.

CARB has issued a public [solicitation](#) for information to aid in the implementation of new climate-related disclosure laws, SB 253 and SB 261. Comments may be submitted [here](#) until February 14, 2025.

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

At the MPUC's December 12, 2024 agenda meeting, the MPUC held its initial hearing on Xcel's GRC, wherein it accepted Xcel's rate filing as complete. The MPUC set interim rates, although reduced Xcel's requested amount by about \$31 million (to exclude Xcel's request to include wildfire expenses). Additionally, the MPUC approved an extensive list of issues for record development, including the potential impacts of data center load and how the "fuel to steel transition" might affect inter-generational cost shifting.

Additionally, the MPUC approved the route permit for the controversial Summit Carbon pipeline, a carbon-capture pipeline located near an ethanol plant, that includes a 28-mile segment in Minnesota stretching from Fergus Falls to the North Dakota border. Given the significant controversy surrounding the pipeline, we anticipate additional hurdles will arise before the project can reach completion.

FEDERAL ENERGY REGULATORY COMMISSION (FERC)

On December 16, 2024, FERC issued [189 FERC ¶ 61,195](#), approving proposed revisions to CAISO's Open Access Transmission Tariff (Tariff) to amend its Generator Interconnection and Deliverability Allocation Procedures and its associated generator interconnection agreements (GIAs), as applied to Cluster 14 and earlier interconnection customers that have not already executed GIAs. CAISO states that the Tariff revisions will help manage the large volume of interconnection requests already studied but for which GIAs have not yet been executed or requested to be filed unexecuted or for which the construction of network upgrades has not yet begun.

The order approves Tariff revisions to: (1) subject new small asynchronous generating facilities in Clusters 14 or earlier to fault recording requirements, which CAISO currently only applies to asynchronous generating facilities larger than 20 megawatts; (2) update the granularity of the GIA phase angle measuring unit data requirements for asynchronous generating facilities; (3) require that interconnection customers sharing a network upgrade provide the financing and authorization to construct the shared network upgrade simultaneously, based on the construction timeline necessary to achieve the earliest interconnection customer's commercial operation date; (4) increase the material modification assessment deposit cost from \$10,000 to \$30,000, and extend the estimated time to complete a material modification assessment from 45 days to 60 days; (5) require a new "implementation deposit" of \$35,000 due within 30 days of the effective date of an interconnection customer's GIA; and (6) limit interconnection customers from lingering in the interconnection queue by requiring customers to remove energy only generating capacity from the queue when giving up its deliverability, unless the customer provides an energy only power purchase agreement that demonstrates that its generating capacity is viable

without needing to reacquire deliverability. The approved Tariff revisions were effective December 17, 2024.