

**REGULATORY UPDATE FOR FEBRUARY 11, 2025  
(WEEK OF FEBRUARY 3, 2025)**

**PRESIDENTIAL EXECUTIVE ORDERS AND MEMORANDUM**

On January 20, President Trump issued several Executive Orders and a Memorandum that may have impacts on the energy sector. The actions we are currently monitoring include:

(1) [Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government’s Leasing and Permitting Practices for Wind Projects](#), which includes a temporary cessation of the issuance of new or renewed approvals, rights of way, permits, leases or loans for onshore or offshore wind projects pending the completion of a comprehensive assessment and review of federal wind leasing and permitting practices.

- [Department of the Interior \(DOI\) Order Suspending Delegated Authority](#). The DOI was the first to act in response to this Memorandum when it issued [Order No. 3415](#) on January 20th (DOI Order). In the DOI Order, the Secretary of the Interior suspended the delegation of authority to all department bureaus and offices (which includes the Bureau of Reclamation, Bureau of Land Management, and U.S. Fish and Wildlife Service (USFWS)) “[t]o issue *any onshore or offshore renewable energy authorization*, including but not limited to a lease, amendment to a lease, right of way, amendment to a right of way, contract, or any other agreement required to allow for renewable energy development.” (emphasis added.) The order will continue in effect for 60 days or until any provisions are amended, superseded, or revoked. It is unclear at this time whether the 60-day period will be extended.
  - On January 29, 2025, the DOI issued Amendment No. 1 to Order No. 3415, available [here](#). The Amendment expands the list of temporarily suspended actions (*see* Sec. 3.c and 3.d).
- [U.S. Fish and Wildlife Service Notice regarding Eagle Permits](#). In response to the Memorandum, on or about January 24th, the USFWS published a notice on its website for Eagle Disturbance Take (General), that the service is “temporarily ceasing issuance of eagle permits to wind facilities until further notice.” *See* USFWS, [3-200-91: Eagle Disturbance Take](#).

(2) [Unleashing American Energy](#), which states it is the policy of the United States to encourage energy exploration and production on federal lands and waters, and to eliminate the “electric vehicle (EV) mandate,” and which includes a direction to federal agencies to immediately pause the disbursement of funds appropriated through the Inflation Reduction Act of 2022 or the Infrastructure Investment and Jobs Act.

(3) [Declaring a National Energy Emergency](#), which includes direction to the heads of executive departments and agencies to identify any lawful authorities available to them to facilitate the identification, leasing, siting, production, transportation, refining, and generation of domestic energy resources, including, but not limited to, on federal lands.

Stoel Rives is actively tracking the energy sector impacts of these Executive Orders and Memorandum, as well as other actions taken by the new administration.

You may contact a member of our team or, to learn more about the energy-related Executive Orders we are tracking, visit <https://www.stoel.com/executive-orders>.

## **CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)**<sup>1</sup>

### Proposed Decisions and Resolutions

Resolution (Res) E-5364 (Updates to the Inputs and Assumptions used in Bill Savings Estimates, to be included in California Contractors State License Board Solar Energy System Disclosure Document Provided to Solar Customers During the Interconnection Process, Pursuant to Decision (D.) 23-11-068). This resolution updates the inputs and assumptions used in bill savings estimates provided to potential residential solar customers by solar providers to align with the net billing tariff, pursuant to D.23-11-068 and D.20-08-001. Following Commission adoption of this resolution and the stakeholder review process, the California Contractors State License Board will make any edits suggested by the Commission or stakeholders if they are consistent with the requirements of California Business and Professions Code § 7169(c) and finalize the Solar Energy System Disclosure Document. Pursuant to Decisions D.23-11-068 and D.22-12-056, this disclosure document is incorporated into the required documentation necessary to interconnect residential solar and storage systems under the net energy metering and net billing tariffs.

Res E-5372 (San Diego Gas & Electric Company (SDG&E) Utility Owned Energy Storage Contract). This resolution approves SDG&E's request for approval of a utility owned energy storage contract procured to address 2025 summer reliability. The contract is a Build, Own, and Transfer contract with CED Westside Canal Battery Storage LLC (RWE AG) for 100 megawatts (MW) of nameplate capacity.

Rulemaking (R.) 18-07-005 (Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs). This decision eliminates a requirement imposed on Pacific Gas and Electric Company (PG&E), SDG&E, Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas) to file quarterly Advice Letters (AL) summarizing the status of their disconnection moratoria for medium-large commercial and industrial customers. The reporting requirement is no longer relevant as the disconnection moratoria for medium-large commercial and industrial customers has ended.

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<sup>1</sup> 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.

Petition 24-09-013 (Petition to Adopt, Amend, or Repeal a Regulation pursuant to Public Utilities Code Section 1708.5). This decision denies the petition of the Independent Energy Producers Association to open a rulemaking to amend General Order 167-B.

Res E-5375 (PG&E Sale of 2025-Delivery Renewable Energy Credits). This resolution rejects PG&E's sale of 100,000 MW Portfolio Content Category 1 Renewable Energy Credits to NRG Business Marketing, LLC. The resolution agrees with protestors that PG&E diverged from its approved RPS Sales Framework in its procurement and evaluation methodology as approved by D.23-12-008.

### Voting Meeting

The CPUC will hold a voting meeting in Sacramento, California on February 20, 2025 at 11:00 a.m. The following are energy-related items on the [agenda](#):

Item 3. Res G-3612 (SoCalGas Biomethane Contracts). This resolution addresses SoCalGas's request for approval of three biomethane procurement contracts pursuant to the Renewable Gas Standard (RGS), as established in D.22-02-025. This resolution approves with modifications SoCalGas's contract with Organic Energy Solutions (OES) and rejects both contracts with Anew Climate (Keller Canyon) and Anew Climate (Forward). The resolution finds that the OES contract meets the requirements of both the short-term and medium-term RGS targets and contributes toward the program organic waste diversion goal established in D.22-02-025 at a price that is appropriate for low-carbon, Senate Bill (SB) 1383 feedstock-compliant biomethane in a nascent market. The resolution finds that the Anew Climate contracts do not meet the short-term procurement requirements and, as stated in D.22-02-025, "[e]ven if a gas IOU meets its volumetric short-term target, it shall not open procurement opportunities to the additional biomethane sources allowed to meet its medium-term target until it can demonstrate that it has diverted its share of the eight-million-ton organic waste diversion responsibility." The resolution finds that SoCalGas has neither met its volumetric short-term target nor demonstrated that it has diverted its share of organic waste. Therefore, for the aforementioned reasons, the OES contract is approved, and the Anew contracts are rejected.

Item 6. Res E-5363 (PG&E 2024 Local Resource Adequacy Procurement). This resolution approves PG&E's Central Procurement Entity (CPE) resource adequacy (RA) agreement, resulting from the 2024 PG&E-CPE Local RA Request for Offer (RFO), for a new build energy storage facility with a ten-year duration. The resolution finds that this contract will help PG&E-CPE satisfy its procurement obligations towards the multi-year local RA program for the 2025, 2026, and 2027 compliance years.

Item 7. Res E-5373 (SoCalGas, PG&E, SCE, and Center for Sustainable Energy Self-Generation Incentive Program Inflation Reduction Act Tax Credit). This resolution approves, with modification, the joint proposal by SoCalGas, PG&E, SCE, and Center for Sustainable Energy® (CSE) Self-Generation Incentive Program (SGIP) Inflation Reduction Act (IRA) Tax Credit proposal for the new Residential Solar and Storage Equity budget and all other SGIP budgets. This resolution determines how to maximize the federal cost share of SGIP project costs covered by the federal IRA through the adoption of several policies, including but not

limited to, capping the SGIP share of incentive payments at 70 percent of eligible project costs when the SGIP payment is from state funds, the system is third-party owned, or the system is nonresidential so each of these types of projects is eligible to claim an IRA tax credit of 30 percent of eligible project costs.

Item 10. Res E-5371 (SCE Mid-Term Reliability (MTR) Energy Storage Contracts). On December 5, 2024, SCE Submitted AL 5431-E seeking approval of three energy storage contracts selected as part of its MTR Phase 2 and 3 RFO efforts. The MTR contracts total 620 MW of nameplate capacity and are expected to come online June 1, 2026, April 1, 2027, and June 1, 2028. The three contracts are with: Pier S Energy Storage, developed by Pier S Energy Storage, LLC, a project owned by Elevate Renewables; Overnight Storage, developed by ASHUSA Inc., a subsidiary of Atlantica North America LLC; and Euismod, developed by Aypa Power.

Item 14. R.08-06-024 (Petition for Modification of D.10-12-055). This decision denies the petition for modification of D.10-12-055, filed by SCE and SDG&E. The petition sought approval for a new methodology for the Fixed Price Component for the Joint IOUs' Assembly Bill (AB) 1613 contracts for 2024 - 2030 for excess electricity from eligible combined heat and power systems' qualifying facilities of 20 MW or less.

Item 15. Res E-5370 (PG&E MTR Renewable Resource Contracts). This resolution approves four MTR contracts for a total of 750 MW of solar photovoltaic (PV) nameplate capacity and 578.7 MW of battery energy storage system nameplate capacity that PG&E contracted to help meet its MTR requirements. The contracts are with: Atlas North 1 and Atlas North 2 for two co-located projects being developed by 174 Power Global, LLC. B, and Lockhart CL ESS IA and Lockhart CL ESS IIA for two co-located projects being developed by Terra-Gen, LLC.

Item 18. A.24-10-021 (Central Valley Gas Storage Transfer of Control). This decision approves the application of Central Valley Gas Storage, L.L.C. (Central Valley), Caliche Development Partners II, LLC, and Caliche Development Partners III, LLC for a change in control of Central Valley from Caliche Development Partners II, LLC to Caliche Development Partners III, LLC. In addition to approving the change of control, the decision exempts the encumbrance of assets and the issuance of a corporate guaranty and securities by Central Valley from Commission pre-approval.

Item 19. A.23-01-005 (Petition for Modification of Decision 24-03-010). This decision grants the petition to modify D.24-03-010 filed by LS Power Grid California, LLC (LSPGC) on October 9, 2024, seeking to modify D.24-03-010 to update the audit report timing. This decision also approves and adopts without modification, an amendment that reflects the proposed updated audit report timing to the settlement agreement that was approved and adopted in D.24-03-010. Specifically, the fourth full paragraph on page-4 of D.24-03-010 beginning with "(b) LSPGC can submit the audit report required by...." is modified to state: (b) LSPGC can submit the audit report required by Section VI.C every five-years, rather than annually, with the first audit report due no later than May 1st of the year after the calendar year LSPGC becomes a Participating Transmission Owner pursuant to the California Independent System Operator tariff and shall

include an audit for the previous calendar year, with subsequent audits and auditor's reports due every five-years thereafter, on the condition that LSPGC makes its Federal Energy Regulatory Commission Form 1 and Form 3-Q available to California Advocates on request.

Item 33. R.20-05-003 (Electricity Resource Portfolios for the California Independent System Operator for 2025- 2026 Transmission Planning Process). This decision recommends to the CAISO for its 2025-2026 Transmission Planning Process the analysis of two electricity portfolios: a reliability and policy-driven base case portfolio and a sensitivity portfolio. The base case portfolio recommended is based on the greenhouse gas (GHG) emissions target for the electricity sector of 25 million metric tons by 2035, includes the resources contained in the individual integrated resource plans submitted to the Commission by the load serving entities (LSEs) in November 2022, and relies on the same modeling assumptions as the adopted preferred system plan portfolio, with some relevant updates described in this decision. The portfolio achieves 99 percent clean energy serving retail load by 2035, with a portfolio of approximately 63 gigawatts of new storage and clean energy to come online between now and 2035. This decision also asks the CAISO to reserve deliverability on the transmission system for certain diverse resources that are geographically limited and take longer to develop, including geothermal, biomass, offshore wind, non-battery long duration energy storage, and a portion of the total amount of in-state/onshore and out-of-state wind. The decision also requests that the CAISO study, but not yet trigger the investment in, new transmission to support some out-of-state wind and Northern California wind (not within the CAISO Balancing Authority Area), since these resources would require extensive new transmission development that will be complex to accomplish and will require regional cooperation. The sensitivity electricity portfolio recommended is intended to help study the transmission implications of a portfolio with a greater volume of long lead-time (LLT) resources than in the base case portfolio, that relies on the resources included in the LSE plans, with amounts and types similar to the those included in D.24-08-064, while also including the LSE planned resources as submitted in November 2022 only through 2030, with the capacity expansion model allowed to optimize thereafter. The decision finds that the sensitivity analysis will help the state better analyze the appropriate transmission development to support the LLT resources called for in D.24-08-064.

Item 34. R.25-02-XXX (Energy Resource Recovery Account and Power Charge Indifference Adjustment Policies and Processes). This order institutes a Rulemaking to consider changes to rules and processes applicable to the electric fuel and purchased power (Energy Resource Recovery Account, or ERRA) annual forecast and compliance proceedings, as well as changes to the Power Charge Indifference Adjustment (PCIA). The order states that some policy or rule changes applicable to broader procurement guidance that impact ERRA may be considered. The objectives of this proceeding are to consider and identify reasonable improvements to existing ERRA and PCIA rules, mechanisms, and processes to ensure best practices in utility forecasting and other procurement plan activities; to identify ways to mitigate and respond to rate volatility, whether resulting from market conditions or ratemaking constructs; to best ensure indifference among bundled and departed customers; and to provide policy guidance to ensure that individual utility forecast ratemaking proceedings function as efficiently and consistently as possible.



### Upcoming Events and Workshops

*R.23-10-011 RA Workshop on Track 3 Proposals.* On February 12 and February 13, 2025, Energy Division (ED) staff will host a hybrid workshop (both remote and in-person options) for parties to present on the Track 3 Proposals submitted in the RA proceeding. Parties who plan to attend in-person should notify ED Staff (Eric.Dupre@cpuc.ca.gov) by email, and those attending remotely may access the event via [WebEx](#) (Meeting password: RAproposals). The workshop will run from 9:30 a.m. to 5:00 p.m. on Wednesday, February 12, and from 9:30 a.m. to 12:30 p.m. on Thursday, February 13.

### CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

#### Stakeholder Initiatives: Upcoming Meetings and Deadlines

**Cluster 15 Application Status.** All Cluster 15 applicants will be notified on February 12, 2025 via the Grid Resource Interconnection Portal of the application status and overall project score. Application statuses are; 1) technical validation; 2) auction; 3) reimbursement review and 4) withdrawn. Further information is available [here](#).

**Price Formation Enhancements.** CAISO will host a Price Formation Enhancements Phase 2 working group call on February 13, 2025. This session will explore the topic of Fast-Start Pricing. Further information is available [here](#).

**Congestion Revenue Rights Enhancements.** CAISO has posted the comment template for the Congestion Revenue Rights Enhancements working group call held on January 28, and extended the comment deadline to February 14, 2025. Further information is available [here](#).

**Storage Design and Modeling.** CAISO will host a virtual working group meeting for the Storage Design and Modeling initiative on February 20, 2025. Written comments are due March 5, 2025. Further information is available [here](#).

**Flexible Capacity Requirement Methodology.** CAISO will hold a public stakeholder call on February 24, 2025, to discuss the Flexible Capacity Requirement Methodology for 2026 through 2028. Written comments are due March 10, 2025. Further information is available [here](#).

**2025-2026 Transmission Planning Process.** CAISO will host a hybrid public stakeholder meeting on February 26, 2025, covering the 2025-2026 Transmission Planning Process draft study plan. The draft plan will be posted to the process webpage on February 19, 2025. Further information is available [here](#).

**Gas Resource Management Working Group.** CAISO has published an Issue Paper for the Gas Resource Management Working Group initiative, and will host a stakeholder call on February 13, 2025. Written comments are due March 11, 2025. Further information is available [here](#).

**2025 CAISO Legal Forum.** CAISO will host its Legal Forum on Thursday, April 10, 2025, at its headquarters in Folsom, California. 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](#).

**Greenhouse Gas Coordination.** CAISO has published an Issue Paper for its GHG Coordination working group, and held a working group meeting on January 21, 2025. Written comments are due February 11, 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 were 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. According to the [workshop schedule](#) (which is subject to change), after various workshops throughout the past few months, the CEC will consider adoption of the 2024 IEPR Update at the March 17, 2025 Business Meeting.

2025 IEPR

On January 28, 2025, the CEC published a [Notice](#) requesting feedback on the Draft Scoping Order for the 2025 IEPR. According to the [Notice](#), the proposed scope includes: advancing clean energy development; electricity and natural gas forecast; and a load-shift goal update. Comments are due to the Docket Unit by 5:00 p.m. on February 11, 2025. Additional details about the proposed scope are available in the [Notice](#) which also includes a proposed task/event schedule (which is subject to change):

<u>Task/Event</u>	<u>Estimated Date(s)</u>
• Public Workshops on specific topics	December 2024 – January 2026
• Final Scoping Order Released	March 2025
• Adopt order instituting informational proceeding for 2025 IEPR	April 2025
• Release draft 2025 IEPR	November 2025
• Public and tribal engagement and consultation	December 2024 – January 2026
• Release final 2025 IEPR	February 2026
• Adopt 2025 IEPR	March 2026

CEC staff will hold a remote-access [workshop](#) on February 13, 2025 at 1:00 p.m. “to solicit comments on proposed data collection and analysis for the [2025 IEPR] relating to gas demand and rate forecasting information forms and instructions.” Additional information is available [here](#).

### Offshore Wind

The [California Ports and Offshore Wind Symposium](#) (Symposium) will take place on February 21, 2025 at the Port of Long Beach. According to the Symposium [agenda](#), 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](#).

### Demand Side Grid Support (DSGS) Program Guidelines

On January 14, 2025, the CEC issued a draft Fourth Edition with proposed changes (redlined version is available [here](#)) to the DSGS Program Guidelines, which establish the rules for the program, including eligibility requirements, participation process, and incentive options. The DSGS Program was created pursuant to AB 205 (Ting, Chapter 61, Statutes of 2022) and expanded by AB 209 (Ting, Chapter 251, Statutes of 2022). The DSGS Program is part of the State's Strategic Reliability Reserve and provides incentives to reduce customer net-energy load during extreme events with upfront capacity commitments and per-unit reductions in net load.

### Power Source Disclosure

The CEC announced it will hold a public hearing to consider the proposed amendments to the Power Source Disclosure program, which are under consideration in Docket 21-OIR-01. The hearing will take place during the CEC's upcoming Business Meeting on February 12, 2025 at 10:00 a.m. Remote and in-person access information is available [here](#).

### Notice of Proposed Emergency Action on Refinery Reporting Requirements

On January 31, 2025, the CEC released a Notice of Proposed Emergency Action and Express Terms in the docket related to implementation of SBX1-2 (Docket No. 23-OIR-03), the "California Gas Price Gouging and Transparency Law" signed by Governor Newsom in March 2023. The Notice states that the proposed action and express terms will be considered at the February 12, 2025 Business Meeting and, if approved, submitted to the Office of Administrative Law on February 13, 2025 with a potential effective date of February 23, 2025. The proposed regulations would clarify and refine the informational and procedural requirements with respect to existing refinery and major petroleum product marketer projection reports. The proposed regulations also define key terms pertaining to the reporting requirements.

### Zero Emissions Vehicles (ZEVs)

On January 14, 2025, the CEC issued a request for information (RFI) in Docket 22-EVI-04 to better understand the impact of vandalism on charging reliability and to improve convenience for EV drivers. The CEC seeks information from EV charging station operators and other interested organizations, stakeholders, and interested members of the public on the severity, extent, and frequency of vandalism events that render charging ports inoperable. The CEC is also seeking information on measures and practices that have proved effective at



reducing vandalism. The goal of the RFI is to identify and work to prevent or address factors, such as vandalism, that can reduce charger reliability and the public's confidence in a convenient, reliable, and safe charging network for their EVs. The RFI, which is available [here](#), poses a detailed set of questions for stakeholder input. Responses to the RFI may be submitted through Monday, February 17, 2025 by e-filing to the 22-EVI-04 [docket](#).

On January 15, 2025, the CEC extended the deadline from January 24 to February 7 for stakeholder comment on an RFI relating to medium- and heavy-duty ZEVs to better define “public” charging and refueling infrastructure for CEC funding opportunities. CEC Staff seek information regarding the current state of the medium- and heavy-duty (MDHD) market to establish eligibility criteria for upcoming funding opportunities, and this RFI poses specific questions relating to reservation systems used for fleets and the trucking industry, protocols for sites with first-come-first-serve chargers that also allow charging reservations, standardized communication protocols, and other issues relating to public use and public benefit at MDHD charging stations. Additional information relating to the RFI and detailed questions are available [here](#). Comments on the RFI may be submitted through February 7, 2025, on the docket 19-TRAN-02.

#### Lithium Valley Vision Informational Proceeding

On February 19, 2025, Lead CEC Commissioner Noemi Gallardo will host a [workshop](#) to discuss potential strategies, actions and policies in an effort to “help ensure lithium production from the Salton Sea region is competitive with global lithium supplies and prices” as well as to “facilitate expanded geothermal and lithium production in the region in a responsible and locally beneficial manner.” The morning session of the workshop will be hybrid (remote and in-person at the CEC in Sacramento) from 9:00 a.m. to 12:00 p.m., but will be remote-only for the afternoon session scheduled from 1:30 p.m. to 3:30 p.m. Additional information is available [here](#). Written comments may be submitted to the Docket Unit by 5:00 p.m. on February 27, 2025.

#### CEC Business Meetings

The next CEC Business Meeting is scheduled for February 12, 2025. The agenda and back-up materials are available [here](#).

### **CALIFORNIA AIR RESOURCES BOARD (CARB)**

#### Meetings and Workshops

CARB and the CEC held a series of evening community meetings on the state's [Transportation Fuels Transition Plan](#). The agencies plan to host a virtual workshop on the Plan in Spring 2025.

On February 13, 2025, the Scientific Review Panel on Toxic Air Contaminants will hold a public meeting. More information is available [here](#).

### Opportunities for Public Comment

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)**

On February 13, 2025, at its weekly agenda meeting, the MPUC will consider whether to accept the Offer of Settlement, and accept the Administrative Law Judge’s findings recommending approval of Settlement, regarding Xcel Energy’s application to increase rates for its natural gas service in Minnesota (MPUC Docket Nos. G002/GR-23-413 and G002/MR-23-412).

### **FEDERAL ENERGY REGULATORY COMMISSION (FERC)**

On January 30, 2025, FERC issued an order, [190 FERC ¶ 61,057](#), accepting Midcontinent Independent System Operator, Inc.’s (“MISO”) proposed revisions to its Generator Interconnection Procedures (“GIP”) in Attachment X to the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff (“Tariff”). The revisions establish and implement (1) a cap on the total MW value of interconnection requests that may be studied and address the procedures for submitting an interconnection request (“Queue Cap Proposal”); and (2) exemptions related to the queue cap for certain types of interconnection requests (“Exemptions Proposal”). FERC accepted the revisions effective January 31, 2025, and all interconnection requests for which the application deadline to enter the Definitive Planning Phase (DPP) is on or after January 31, 2025 will be subject to the Tariff provisions implementing the 2024 Queue Cap Proposal and the Exemptions Proposal.

Beginning with the DPP-2025 study cycle, MISO will implement a queue cap that will limit the total MWs that will be studied in a particular study cycle for each study region prior to the start of the study cycle based on subregional peak load. The queue cap value is set at 50% of the subregional noncoincident peak load in the summer peak study model. MISO will post the MW value for each study cycle on its website at least 10 business days prior to the relevant application deadline. MISO has established a date and time stamp process to determine which interconnection requests it will include in a study cycle, with the earliest submitted requests selected first and subsequent requests selected until the queue cap is met. Five business days after the queue cap has been met, MISO will notify applicants as to whether their interconnection requests have been included in the upcoming study cycle, and those requests not included in a given study cycle will maintain their queue position, so long as the requests remain valid, and will be entered in the next available study cycle. Additionally, up to 30 calendar days prior to the scheduled DPP Phase I kick-off date for a study cycle, MISO is required to replace any interconnection requests that had been included in the study cycle, but were withdrawn, with interconnection requests that were previously submitted but exceeded the queue cap limit.

MISO provides certain exemptions to the standard evaluation procedures outlined in 2024 Queue Cap Proposal; however, there is not an exemption from the queue cap. Interconnection requests that involve: (1) an increase in the generating facility capacity of a replacement generating facility, (2) a conversion from ERIS to NRIS, and (3) a generating facility with a Provisional Generator Interconnection Agreement (GIA) will qualify for the exemption. Any exemption requests must be received at the time of the interconnection application. Interconnection requests that qualify for an exemption will still be subject to the queue cap, and will be counted toward the queue cap. The exempted interconnection requests will only be given priority access to the queue cycle to which they apply if the queue cap is not met, and once the queue cap is met, will retain priority status for the following queue cycle, subject to that cycle's queue cap and the number of previously queued and approved exemptions.

On January 28, 2025, FERC issued an order in [190 FERC ¶ 61,050](#) denying MISO's request for waiver of Section 4.4.4 of MISO's GIP and Article 2.3.1 of MISO's *pro forma* GIA to allow for an extension of up to two years of the deadline by which interconnection requests in the 2018 and 2019 Definitive Planning Phase study groups must achieve commercial operation, due to supply chain delays.

On January 28, 2025, FERC issued an order in [190 FERC ¶ 61,051](#) accepting New York Independent System Operator, Inc.'s proposed revisions to its Market Administration and Control Area Services Tariff to define the demand curves in the Installed Capacity (ICAP) Market for the 2025/2026 Capability Year, and to identify the methodologies and inputs to be used for subsequent annual updates to the ICAP Demand Curves for the 2026/2027, 2027/2028, and 2028/2029 Capability Years (2025-2029 DCR).

On January 20, 2025, President Trump named Mark Christie Chairman of FERC. Christie began his term as a FERC Commissioner on January 4, 2021, after having been nominated by President Trump in July 2020, and confirmed by the U.S. Senate on November 30, 2020. Before joining FERC, Christie was the Chairman of the Virginia State Corporation Commission for approximately 17 years.