

*Westlands Water District*

**Transmission Owner Access Policy  
(TOAP)**

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**Version Number 1.0**

Westlands Water District  
Transmission Owner Access Policy

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## TRANSMISSION OWNER ACCESS POLICY

Westlands Water District (“WWD”) is recognized as a world leader in agricultural water conservation. As stewards of one of California’s most precious natural resources, WWD continually invests in conservation and champions farmers deploying innovative irrigation methods based on the best available technology. WWD is the largest agricultural water district in the United States by irrigable acres. Its approximately 614,000 acre service territory contains some of the richest farmland in the nation. Since its formation in 1952, the mission of WWD has been to provide timely, reliable and affordable water services to landowners and water users in western Fresno and Kings Counties. Development of electrical transmission infrastructure to support solar energy system and storage development through the Valley Clean Infrastructure Program (“VCIP”) will further WWD’s water conservation efforts, reduce water service costs, and help California reach its clean energy and climate goals. This Transmission Owner Access Policy (“TOAP”) has been created to support WWD in the development of VCIP and establish a transparent and orderly process for receiving, studying, and evaluating Interconnection Requests.

**1.0 Definitions.** Capitalized terms used throughout are defined in Appendix A (Definitions) to this WWD Transmission Owner Access Policy (“TOAP”).

### 2.0 Authority

2.1 **Statutory Authority.** WWD is a public agency and California water district organized under Division 13 of the California Water Code and is exempt from the jurisdiction of the Federal Energy Regulatory Commission (“FERC”).

2.2 **AB 2661.** Assembly Bill (“AB”) 2661 (Soria) was approved on September 25, 2024, and is codified as California Water Code Sections 37860-37861. AB 2661 acknowledges “the unique need of the Westlands Water District to support the development of solar electrical generation for the electrical grid and to facilitate the development of transmission capacity to help California reach its clean energy and climate goals” on drainage-impaired and water supply-limited lands.<sup>1</sup>

AB 2661 authorizes WWD to: (1) provide, generate, and deliver solar photovoltaic electricity, and construct, operate, and maintain any and all works, facilities, improvements, and property necessary to generate and deliver the electricity; (2) construct, operate, and maintain energy storage systems; and (3) construct, operate, and maintain electrical transmission lines and related works, facilities, improvements, and property. (Water Code, § 37861.) AB 2661 also states that WWD shall establish a community benefits agreement plan for the VCIP and related transmission and other electrical projects constructed under AB 2661 designed to ensure local communities access the benefits associated with projects associated with VCIP. (Water Code, § 37862.)

2.3 **California Environmental Quality Act Compliance.** WWD adopted and approved the Valley Clean Infrastructure Plan – Final Program Environmental Impact Report (SCH #2024020124, “Final Program Environmental Impact Report”) for VCIP through Resolution No. 122-25. The Final Program Environmental Impact Report contains the Mitigation, Monitoring and Reporting Program for VCIP, which identifies the monitoring requirements and mitigation measures to ensure the WWD Transmission System and related transmission infrastructure and facilities are consistent with the Final Program Environmental Impact Report. Generating Facilities are anticipated to be consistent with the Final Program Environmental Impact Report, including the Mitigation, Monitoring and Reporting Program, or otherwise demonstrate compliance with the California Environmental Quality Act.

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<sup>1</sup> Section 2 of Assembly Bill 2661 (Soria; 2024).

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### 3.0 Transmission System

- 3.1 **Purpose.** The WWD transmission facilities included in the VCIP are being planned, designed, constructed and operated consistent with the authority provided under AB 2661 and to meet the policy goals, including the community benefits, articulated in the legislation. VCIP describes the initial transmission facilities that WWD is developing and that will be available for generator interconnection pursuant to the WWD Large Generator Interconnection Procedure (Appendix C). Additional transmission facilities may be developed in the future by WWD.
- 3.2 **Principles.** The WWD TOAP, including the Large Generator Interconnection Procedure (“LGIP”), has been created to support WWD in the development of VCIP and generation interconnection to the WWD Transmission System. The WWD TOAP establishes a transparent and orderly process for receiving, studying, and evaluating Interconnection Requests.

### 4.0 Interconnection and Transmission Service

- 4.1 **Interconnection Service.** Interconnection Service allows an Interconnection Customer to physically connect a Large Generating Facility to the WWD Transmission System as more fully described in the LGIP. Interconnection Service does not convey transmission service, deliverability status, congestion revenue rights, or firm transmission capacity. Transmission service, if available, is subject to separate arrangements.
- 4.2 **Technical Requirements.** The technical and operational requirements for Generating Facilities interconnecting to the WWD Transmission System can be found in Appendix B (Technical Requirements) to the WWD TOAP.
- 4.3 **Large Generator Interconnection Procedure.** The policies and procedures for Generating Facilities seeking to interconnect to the WWD Transmission System can be found in Appendix C (Large Generator Interconnection Procedure) to the WWD TOAP.

### 5.0 Cost Recovery and Financial Provisions.

- 5.1 **Cost Recovery.** VCIP is new construction, the purpose of which is ultimately to interconnect the WWD Transmission System, and the generation interconnected thereto, to the California Independent System Operator (“CAISO”) or another Balancing Authority. In Resolution No. 123-25, Resolution of the Board of Directors Approving and Adopting the Valley Clean Energy Infrastructure Plan, December 16, 2025, WWD directed its General Manager to submit an application or take other appropriate steps as necessary to become a CAISO participating transmission owner or work with another California Balancing Authority to exercise operational control of the WWD Transmission System developed as part of VCIP.

WWD will not reimburse Interconnection Customers for Interconnection Facilities costs, or Network Upgrade costs incurred to interconnect to the WWD Transmission System, including any costs for facilities required at or beyond the Point of Interconnection. Interconnection Customers will be responsible for the costs of their own Interconnection Customer Interconnection Facilities, WWD’s Interconnection Facilities required to interconnect to the WWD Transmission System, including any Network Upgrades not already included in the VCIP baseline transmission configuration. WWD currently expects that Network Upgrades, as traditionally defined as additions, modifications, or upgrades to the transmission system at or beyond the Point of Interconnection, may be limited; however, to the extent such Network Upgrades are identified through the Interconnection Study process, the Interconnection Customer shall be solely responsible for such costs, without reimbursement from WWD.

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If WWD becomes a Participating Transmission Owner in CAISO or another Balancing Authority, cost responsibility, reimbursement eligibility, and any applicable crediting or repayment mechanisms for Interconnection Facilities or Network Upgrade costs shall be determined in accordance with the applicable tariff and rules of the Participating Transmission Owner and/or Balancing Authority.

Cost responsibility established prior to such integration shall remain in effect unless modified through the applicable integration process, and WWD will use commercially reasonable efforts to avoid duplicative cost responsibility for the same facilities; provided that final determinations shall be governed by the applicable tariff and rules of the Transmission Owner and/or Balancing Authority.

- 5.2 **Conditionality.** WWD may condition service to preserve compliance with financing and tax requirements. WWD reserves the right to recover costs associated with financing constraints, tax compliance requirements, and customer-requested schedule acceleration.
- 5.3 **Facilities Financed by Local Furnishing Bonds.** Notwithstanding any other provision of this TOAP, WWD will not be required to provide Interconnection Service to any Interconnection Customer if the provision of such Interconnection Service would jeopardize the tax-exempt status of any local furnishing bond(s) used to finance WWD's facilities that would be used in providing such Interconnection Service. If WWD determines that the provision of Interconnection Service requested by Interconnection Customer would jeopardize the tax-exempt status of any local furnishing bond(s) used to finance facilities used in providing Interconnection Service, it shall advise the Interconnection Customer of such determination. Interconnection Service may be provided if WWD has obtained an opinion from WWD's bond counsel that providing such Interconnection Service does not cause the interest on the local furnishing bonds used to finance the WWD facilities used in providing the service to be included in gross income for purposes of federal income taxation. If it is necessary to obtain an opinion of counsel, the associated legal fees will be included in WWD's Interconnection Study costs to be paid for by the Interconnection Customer.

## **6.0 Transmission System Integration Path.**

- 6.1 **Integration.** WWD is taking steps to become a CAISO participating transmission owner or work with another California Balancing Authority to exercise operational control of the WWD Transmission System. WWD anticipates that the WWD Transmission System, including Interconnection Customers, may be integrated into a regional transmission planning process, tariff, or some other form of integration arrangement with an existing Balancing Authority. If such integration occurs, interconnection agreements and cost responsibilities will be addressed in accordance with applicable tariff provisions and transition arrangements, as will other applicable generator interconnection procedures to the extent permitted under the applicable rules and process.