



Submit comment on Draft study plan

2022-2023 Transmission planning process

[CalWEA Comments as Submitted into the ISO online comment template 3/14/22.]

1. Comment on chapter 1 Introduction: *

If the ISO develops a plan to integrate the annual TPP cycle with its conceptual 20-year plan, as discussed in response to question 3, below, it can add a discussion about how the ISO is getting in front of the acceleration of clean energy development.

2. Comment on chapter 2 Reliability Assessment: *

We strongly encourage the ISO to propose more incremental upgrades, taking take into account needed upgrades that repeatedly arise in GIDAP studies and consider them as alternative, more cost-effective solutions to reliability or economic problems that are being addressed in the TPP. An example is the Gates 500/230-kV transformer bank #13, which has shown up in GIDAP for many years, and would also address resource curtailments while providing RA capacity for many additional resources.

3. Comment on chapter 3 Policy-Driven RPS Transmission Plan Analysis: *

It is not sound to assume, in the SSN deliverability study, that all non-wind and non-solar resources simultaneously produce up to their full NQC. CalWEA previously proposed that the SSN test be eliminated altogether. In the 20-year Transmission Outlook, the ISO at least improved on the methodology by assuming that energy storage resources do not produce under the SSN (gross peak) condition (when solar generation is high and storage resources will generally be charging). The ISO should likewise make this important modification to the on-peak deliverability assessment methodology in the current TPP cycle. While this modification is still insufficient, since all non-wind and non-solar resources are still assumed to produce up to their full NQC, it should substantially increase available transmission capacity while maintaining system reliability.

Further, it is critical that ISO develop a means of explicitly connecting its 20-year conceptual transmission plan with the annual TPP cycle so that we can make continual progress toward the long-term plan. To do that, as we explained in our comments on the ISO's first 20-year conceptual plan, CalWEA urges the ISO to work in the SB 100 Joint Agency process to develop a least-regrets (perhaps no-regrets) 20-year planning process in which three significantly different, but plausible, 2040 resource scenarios are created for which actual (rather than conceptual) transmission plans are independently developed. Those upgrades that are common to all three scenarios should move forward in the annual TPP cycle for presentation to the CAISO board for approval because they will

facilitate most any potential build-out plan. Those upgrades that are common to two out of the three scenarios should be closely monitored as part of the annual TPP cycle as replacement (potentially more costly replacement) solutions to address reliability, economic and/or policy upgrades that are identified in the TPP. This least-regrets process would ideally commence in the current 2022-23 cycle.

4. Comment on chapter 4 Economic Planning Study: *

Please see comment in response to Question 2.

5. Comment on chapter 5 Interregional Transmission Coordination: *

No comment.

6. Comment on chapter 6 Other Studies: *

No comment.

7. Please provide any additional comments: *

No comment.