



## **Submit comment on Reliability assessment and study updates**

2023-2024 Transmission planning process

### **1. Please provide your organization's comments on the Recommended Reliability Projects less than \$50 million for the North Region.**

Please see CalWEA's response to question 6.

### **2. Please provide your organization's comments on the Recommended Reliability Projects less than \$50 million for the South Region.**

Please provide short circuit duty information for Mira Loma East and West 220kV buses in 2025 and 2035 respectively.

### **3. Please provide your organization's comments on the MIC Expansion Requests.**

Some of the undeliverable MIC Expansion Requests could be deliverable once CAISO adopts its proposed deliverability assessment methodology reform.

### **4. Please provide your organization's comments on the Preliminary Policy Assessment Results for the SCE & GLW areas.**

Some of the upgrade needs shown for the sensitivity portfolios in the previous TPP cycle are not present in this cycle even though the base portfolio is similar to the previous sensitivity portfolio. CalWEA urges CAISO to post the study base cases as soon as possible to support stakeholders' understanding of the underlying reasons for this discrepancy. The Lugo-Victorville 500kV overload is no longer reported in the study, eliminating the need for Lugo-Trout Canyon 500kV upgrade. Many generation interconnection projects are relying on this upgrade to obtain deliverability. In addition to the factors that CAISO mentioned on the call impacting the study results, please provide a comparison of IPP DC flow in the deliverability assessment between the two cycles, which may explain the discrepancy.

### **5. Please provide your organization's comments on the Preliminary Policy Assessment Results for the SDG&E area**

The two mitigations proposed in SDG&E area are to use shorter-term emergency ratings, which have zero cost. CalWEA urges CAISO to implement the mitigations immediately in the generation interconnection process to provide more deliverability in the upcoming TPD allocation.

### **6. Please provide your organization's comments on the Preliminary Policy Assessment Results for the PG&E area**

CalWEA and other parties are advocating at the CPUC that the Commission retain at least 1.6 GW of offshore wind off the North Coast in its adopted 2023 Proposed System Plan, as was included in the 2023-24 base case portfolio, to support the CAISO's continued planning for these necessary upgrades. More generally, CalWEA and other parties are advocating in the CPUC's planning process, as we have in the TPP process, that the state should strengthen the transmission backbone in PG&E's service territory, rather than continue with piecemeal upgrades. CalWEA notes that the same overloads in PG&E's service territory have been identified in three consecutive TPP cycles and CAISO is still not addressing the problem properly.

Specifically, the overloads in the North Dublin-Vineyard 230kV & Cayetano-Lone Tree 230kV path have been addressed as follows:

1. 2021-2022: Collinsville 500kV (the mitigation did not work at all and, in fact, made the overload worse since Collinsville upgrade doesn't create new transmission capacity)
2. 2022-2023: series reactors
3. 2023-2024: reconductor (proposed)

This 230kV path is parallel to the Collinsville-Tesla 500kV path. The 500kV upgrades from Fern Road to Telsa to support OSW would reduce flows on the 230kV path as well. Therefore, should the CPUC restore 1.6 GW of North Coast offshore wind to the PSP, these needs should be examined together to strengthen backbone transmission capacity in the area, rather than inefficiently continuing patchy solutions.

In the unfortunate event that North Coast offshore wind is not included in the adopted PSP in February, CAISO should refine the scope of the previously approved Collinsville upgrade to include: 1) series compensation reduction on Fern Road to Telsa path; and 2) up to 20 ohms reactor on Collin-Pittsburg before the upcoming TPD allocation. The series compensation reduction will be effective in providing additional deliverability to generators in the North of Greater Bay Area and will thus continue making some progress towards the state's clean energy goals.

**7. Please provide your organization's comments on the Preliminary Economic Analysis Results.**

No comment.

**8. Please provide any additional comments on the November 16, 2023 Transmission Planning Process Stakeholder Meeting.**

No comment.