



Submit comment on Draft 2024-2025 Transmission Plan

2024-2025 Transmission planning process

1. Please provide your organization's comments on Reliability-driven Projects Recommended for Approval.

2. Please provide your organization's comments on Frequency Response.

3. Please provide your organization's comments on Maximum Import Capability Expansion Requests.

4. Please provide your organization's comments on Policy-driven Projects Recommended for Approval.

The draft plan does not fulfill the CPUC's request to plan transmission for the 5.2 GW of in-state wind energy included in the base portfolio in its Decision 24-02-047 (issued on February 15, 2024). CAISO must consider the FCDS capacity that has already been allocated and ensure that additional capacity is being planned as needed to accommodate the wind resources in the CPUC's portfolio.

CalWEA is primarily concerned with the SCE Northern and SDG&E study areas where wind development interest is currently the strongest. (Development interest is also strong in far Northeast California outside of the CAISO balancing area; however, in its most recent decision for the 2025-2026 TPP, the CPUC asks CAISO to study, but not yet plan for, transmission in this area.¹)

In the SCE Northern study area, the CPUC requested CAISO to plan for 564 MW of FCDS wind. Of this, 100 MW at Whirlwind has already been awarded FCDS. For the remaining 464 MW, however, Windhub is fully subscribed, and Whirlwind and Antelope will be fully subscribed after QC 15. Therefore, to fulfill the CPUC's request, CAISO must plan for 464 MW as indicated on Map 3.5-14. Alternatively, CAISO could plan for this wind capacity at Windhub, as CalWEA recommended in its November 27, 2024.²

¹ CPUC D. 25-02-026 (February 20, 2025) at p. 59.

² CalWEA recommended as follows: Development of cost-effective and IRP-planned resources in the SCE Northern Area, and specifically in the Tehachapi wind resource area, has been hampered by near-zero TPD capacity for that area as well as the CAISO-imposed Windhub Substation export limit under the extreme system event criteria – potential blackout condition due to simultaneous loss of both 500kV lines from Windhub. CalWEA's studies show that the addition of a 230kV double-

Similarly, in the SDG&E study area, the CPUC requested CAISO to plan for 1,325 MW of FCDS wind. Of this, 300 MW of wind has been awarded FCDS. For the balance of 1,025 MW, however, the area is fully subscribed; therefore, CAISO should plan for that additional 1,025 MW of capacity to fulfill the CPUC's request.

Further, CAISO should provide consistency with the CPUC's request in its recent decision adopting a portfolio for the 2025-2026 TPP by reserving this additional FCDS capacity for wind energy. CAISO indicated its desire to act consistently with this recent CPUC decision on p. 105 regarding planning for Wyoming wind capacity.

5. Please provide your organization's comments on the Economic Assessment.

6. Please provide your organization's additional comments on the Draft 2024-2025 Transmission Plan April 15, 2025 stakeholder call discussion.

circuit transmission line using high-capacity double-bundle conductors from the Windhub 230kV bus to the Vincent 230kV bus would obviate the need for the export capacity limit out of the Windhub substation. Further, when combined with a low-cost fix (<\$20M) to eliminate the ground clearance limitation for the Antelope Vincent 500kV line, this 230kV line upgrade would add more than 3,000 MW of TPD capacity to the Tehachapi wind resource area at Windhub, Whirlwind, and/or Antelope Substations. More than double that amount of solar and wind capacity is included in the 2024-25 CPUC portfolio as well as the CPUC's draft 2025-26 portfolio. Thus, CalWEA strongly recommends that CAISO consider approving the Windhub-to-Vincent 230kV line and addressing the ground clearance limitation for the Antelope Vincent 500kV line as part of its 2024-25 TPP.