Submit comment on 2022-2023 Transmission planning process

2022-2023 Transmission planning process – November 17, 2022, Stakeholder Meeting

1. Please provide your organization's comments on accessing out-of-state Idaho wind resources.

No comment at this time.

2. Please provide your organization's comments on the Recommended Reliability Projects less than $50 million for the North region.

No comment at this time.

3. Please provide your organization's comments on the Recommended Reliability Projects less than $50 million for the South region.

No comment at this time.

4. Please provide your organization's comments on the MIC Expansion Requests.

CalWEA generally supports backbone transmission expansions from development areas that are identified in multiple IRP scenarios. Applying that principle, the need for transmission upgrades to support MIC expansion does not seem necessary at this time.

5. Please provide your organization's comments on the Preliminary Policy Assessment Results for the SCE and GLW areas.

CalWEA is pleased that the CAISO has identified multiple alternate transmission upgrade options to meet the IRP policy target given the substantial need for transmission over the long term. As part of selecting the most suitable upgrade transmission alternatives, we urge CAISO to perform analysis to determine how much incremental deliverability each upgrade option provides, and to share the results with stakeholders. Such analysis should be properly coordinated with the generation interconnection studies to determine which upgrades would provide the largest increase in deliverability available to the generation in the queue.

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

Our response to Question 5 also applies here.

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

It is obvious that CAISO took a very different approach to identifying mitigations in the PG&E area vs. southern California and Gridliance areas. Mitigations in the PG&E area are more narrowly focused on overloads without accounting for longer-term transmission needs. CalWEA supports using the same approach for the PG&E area as CAISO has applied to the other areas, i.e., using the 30 MMT, high electrification sensitivity portfolio to identify transmission upgrades. Such planning would be consistent with the encouragement expressed in the CPUC's October 7, 2022, ruling on the electricity resource portfolios that the Commission will provide for the 2023-24 TPP cycle, where the base case is anticipated to be in line with the 30 MMT sensitivity case.

In that ruling, the Commission encourages the CAISO to get a "head start" on identifying needed transmission in the current TPP cycle. CalWEA also expects the CPUC will timely fulfill its requirement under SB 887 to request that the CAISO "identify the highest priority transmission facilities that are needed to allow for increased transmission capacity into local capacity areas" in the current TPP cycle.

Regarding the series reactor solutions proposed for several 230kV transmission line overloads, CalWEA urges the CAISO to address downsides of such mitigations and use the 30 MMT sensitivity to consider longer-term transmission solutions, which would provide badly needed deliverability to generation in the queue in that area. One example is the mitigation North of the Greater Bay Area. Instead of adding series reactors on the Collinsville - Pittsburg 230kV lines, a better solution might be to remove the series cap from Vaca Dixon to Collinsville, which would effectively reduce flows not only on Collinsville-Pittsburg, but also on Vaca Dixon to Collinsville to Tesla and save the cost of the series capacitors and reactors. Further, adding a new 500kV line, as proposed in the CAISO's 20-year Outlook, would support the North Coast offshore wind in the 30 MMT sensitivity portfolio and provide deliverability to numerous new resources in the area.

CalWEA does, however, strongly support the PG&E-area proposal to use substantial amounts of battery energy storage systems (BESS) to mitigate off-peak congestion. BESS is an efficient solution because the capacity can simultaneously satisfy the RA requirements of the LSEs that procure it, saving ratepayers the cost of additional transmission (or BESS as a transmission solution). Moreover, there is more than enough BESS in the queue to address this need.

CalWEA urges CAISO to give the same consideration of BESS as a congestion solution under the SSN off-peak deliverability assessment, since the SSN scenario addresses congestion issues rather than reliability issues.

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

No comment at this time.

9. Please provide your organization's comments on the Preliminary LCR study results for the North region.

No comment at this time.

10. Please provide your organization's comments on the Preliminary LCR study results for the South region.

No comment at this time.

11. Please provide your organization's comments on the Special Study Reduced Reliance on Aliso Canyon Gas Storage.

CalWEA supports the special study to reduce reliance on Aliso Canyon and expresses particular support for one of the five alternatives found to be effective – 1A, which, as noted, would also provide Path 26 congestion relief. Further, it would provide access to Morro Bay offshore wind resources for the major southern CA load centers. In addition, this subsea solution would provide important wildfire risk-reduction benefits and, by interconnecting at coastal sites, would avoid the need for new urban infrastructure which will reduce permitting and construction times.

12. Please provide any additional comments on the November 17, 2022 stakeholder meeting.

No additional comment at this time.