



Submit comment on Draft 2021-2022 Transmission Plan

2021-2022 Transmission planning process

[Comments entered online into CAISO template]

1. Please provide your organization's overall comments on the Draft 2021-2022 Transmission Plan Feb 7, 2022 stakeholder call discussion: *

In the 20-year Transmission Outlook study, the ISO improved on the deliverability 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.

2. Comment on chapter 1 Overview of the Transmission Planning Process: *

No comment

3. Comment on chapter 2 Reliability Assessment – Study Assumptions, Methodology and Results: *

We believe that CAISO should be proposing more incremental upgrades. CAISO should take into consideration potential 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. CAISO appears to have done something similar with its proposed Collinsville upgrade, which appears to be an expensive solution but also addresses long-term needs identified in the 20-year Transmission Outlook.

4. Comment on chapter 3 Policy-Driven Need Assessment: *

The draft report is missing study assumptions for out-of-state wind and offshore wind in the policy deliverability assessment. Please provide the study assumptions and the rationale for them. Please also clarify which out of state resources are assumed to use existing import capability to deliver energy to California demand and which ones require deliverability beyond the existing import capability.

Some recommended policy upgrades seem heavily oversized, apparently to align with the CAISO's 20-year Transmission Outlook. As CalWEA explained in our comments on the 20-year Outlook,

connecting the 20-year plan with the annual TPP cycle is important so that we continually make progress toward the long-term plan. However, the ISO should provide clarification on this point and explain how these upgrades are “least regrets.”

As CalWEA has commented previously, it is not sound to assume, in the SSN deliverability study, that all non-wind and non-solar resources 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 condition. The ISO should make such modifications to the on-peak deliverability assessment methodology in the current TPP cycle and in GIDAP as well.

5. Comment on chapter 4 Economic Planning Study: *

CalWEA supports the CAISO’s assumption (stated in response to a stakeholder question) that OOS transmission project costs (e.g., Sunzia) should be included in the analysis, even if covered by developers, to promote apples-to-apples comparisons, since ratepayers will pay one way or another.

6. Comment on chapter 5 Interregional Transmission Coordination: *

No comment

7. Comment on chapter 6 Other Studies and Results: *

No comment

8. Comment on chapter 7 Special Reliability Studies and Results: *

No comment

9. Comment on chapter 8 Transmission Project List: *

No comment