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**CWG Comments on CEC Docket 17-MISC-01_100622 OSW
Workshop**

Additional submitted attachment is included below.

October 20, 2022

California Energy Commission
Docket No. 17-MISC-01
Docket Office
1516 Ninth Street
Sacramento CA 95814

Re: Docket No. 17-MISC-01: California Western Grid Comments Following October 6, 2022, Workshop on Assembly Bill 525: Preparing a Strategic Plan for Offshore Wind Development

California Western Grid Development, LLC (“California Western Grid”) appreciates this opportunity to comment on the Commission’s comprehensive efforts to prepare a strategic plan for offshore wind development pursuant to the requirements of AB 525. California Western Grid’s Pacific Transmission Project (“PTEP”)¹ is a 2,000 MW controllable HVDC subsea transmission cable that the California Independent System Operator (“CAISO”) has found will allow new and existing supply, *including OSW*, to be available to the Diablo Canyon 500 kV switchyard, for delivery to the LA Basin and the Big Creek Ventura areas, which would reduce local capacity requirements among solving other issues. The PTE Project is described in Section 4.8.8 of the 2021-2022 CAISO Transmission Report issued March 24, 2021.² The PTE Project is also currently being restudied by the CAISO in the current 2022-2023 CAISO Transmission Planning Process (“TPP”).

California Western Grid strongly supports the effort to develop a strategic plan for advancing OSW offshore wind (“OSW”). However, CWG submits that any OSW strategic plan which does not include recommending that CAISO urgently approve new transmission projects that facilitate delivering OSW—not only onto the grid but into coastal load centers--will compromise the primary goals of AB 525 including increased resource diversity, reducing air pollution in disadvantaged communities and mitigating wildfire risks.

Anyone that wants to promote OSW has an opportunity right now to reduce the time for developing OSW by urging the CAISO to approve transmission in the CAISO’s current 2022-2023 planning cycle that can deliver OSW into our largest load center. SB 887 (Chapter 358—Statutes of 2022) provides the CPUC and CAISO with extra guidance and tools making it clear that transmission is urgently needed particularly into transmission-constrained load centers.

¹ Three Rivers Energy Development, LLC (TRED) is an Independent Transmission Developer that is developing the proposed Pacific Transmission Expansion Project on behalf of California Western Grid and submitting these comments on its behalf

² <http://www.caiso.com/Documents/ISOBoardApproved-2019-2020TransmissionPlan.pdf>.

The CAISO has made important findings that warrant approving PTEP in the current cycle. By delivering power from the central coast, it will be able to deliver both existing clean energy and OSW directly in LA, while reducing the requirement to rely on local capacity by 1,993 MWs. In its 2021-2022 TPP Order, CAISO also found PTEP increases the amount of OSW that can be delivered to the grid.

Additionally, in its 20-Year Transmission Outlook, CAISO found that PTEP is an example of the type of HVDC line that is needed between Diablo Canyon and LA to comply with SB 100 clean energy goals. That being the case, there is simply no reason not to approve a project like PTEP in the current cycle to meet multiple goals—including delivering OSW and other clean energy into the state’s most populous load center; advancing energy diversity; reducing air pollution in disadvantaged communities; and mitigating risk of wildfires.

Once the CAISO has approved transmission projects needed to advance OSW and other clean energy goals, California Western Grid also respectfully submits that the state must find a way to reduce permitting delays. We understand that this issue is likely to be taken up by the Legislature again in 2023, and we urge the Commission to make this a priority in its strategic plan.

Thank you for the opportunity to file comments on this important topic.

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