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Document Title:	Clean Power Alliance (CPA) Response to California Energy Commission's Transmission-Related Data Request
Description:	Clean Power Alliance (CPA) Response to California Energy Commission's Transmission- Related Data Request
Filer:	Ben Gustafson
Organization:	Clean Power Alliance
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November 29, 2022

California Energy Commission (CEC)
Attn: Mark Hesters
Docket No. 22-IEPR-03
715 P Street
Sacramento, CA 95814

RE: CPA Response to "Electric Transmission-Related Data Collection" Needed for 2023 Integrated Energy Policy Report & the 2023 Strategic Transmission Investment Plan

Introduction

Clean Power Alliance of Southern California (CPA) is a Load Serving Entity (LSE) and administrator of a Community Choice Aggregation (CCA) program. Formed as a Joint Powers Authority (JPA) that began serving customer load in February 2018 and currently provides energy to approximately 1 million customer accounts across its 32 member jurisdictions.

On July 5, 2022, the California Energy Commission (CEC) staff issued a report titled "Instructions for Electric Transmission-Related Data Collection" requesting LSEs provide "information on new or upgraded transmission required to deliver energy from contracted resources, generators, or power purchase agreements (PPAs) needed by the load-serving entities (LSEs) to meet Renewable Portfolio Standards and the state's Senate Bill 100 (SB 100, De León, Chapter 312, Statutes of 2018) goals. For resources within and outside California, the CEC requests the identification of the generating resource and general information on any new or upgraded transmission required to deliver energy from the resource."[1]

The report notes that "LSEs and transmission owners that are part of the California Independent System Operator's (California ISO) balancing authority can rely on the California ISO Transmission Planning Process for transmission information."[2] Additionally, the report requires parties to file their responses by October 21, 2022.

As a CCA, CPA is a California Public Utilities Commission (CPUC)-jurisdictional LSE that relies on the California ISO's Transmission Planning Process (TPP) for its transmission

[1] *See*, Hesters, Mark. July 2022. Instructions for Electric Transmission-Related Data Collection. California Energy Commission. Publication Number: CEC-200-2022-004 at 3.
[2] *Id*. at 4.

information and does not own, operate, or maintain any transmission facilities. CPA recognizes it is filing this response after the due date of October 21, 2022, however, based on communications with CEC staff CPA has been instructed that an extension request is not necessary. To the extent an extension request is required, CPA respectfully requests clarification on the requirement.

In response to the CEC's five specific questions in the July 5 report, CPA reiterates it does not own, operate, or maintain any transmission facilities and therefore believes questions 1-4 are not applicable. The information requested in question 5 is provided in Table 1 below. Additionally, CPA notes further information is available in its Integrated Resource Plan (IRP) that was approved for filing with the CPUC by the CPA Energy Planning & Resource Committee on October 26, 2022 and can be accessed at https://cleanpoweralliance.org/wp-content/uploads/2022/10/10-26-22-Energy-Committee-Agenda-Packet.pdf.

Table 1. CPA Response to Question 5

Resource Name	Capacity (MW)	Transmission Facility Needing Upgrade
Cape Station	33	Planned POD is the IPP Station Switchyard via the Milford Wind Line, pending private agreement with transmission line owner. Prospective Large Generator Interconnection Agreement with LADWP for interconnection agreement at IPP Station Switchyard.

For additional information please contact the following CPA staff:

John McNamara
jmcnamara@cleanpoweralliance.org
(323) 640-7662

Sincerely,

John McNamara
Director, Structured Contracts