

DOCKETED	
Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	250746
Document Title:	COMMENT OF GSCE ON WORKSHOP RESOURCE PORTFOLIO ASSUMPTIONS FOR CAISO 20-YEAR OUTLOOK UPDATE
Description:	N/A
Filer:	System
Organization:	Golden State Clean Energy, LLC
Submitter Role:	Public
Submission Date:	6/26/2023 6:08:33 PM
Docketed Date:	6/26/2023

*Comment Received From: Golden State Clean Energy, LLC
Submitted On: 6/26/2023
Docket Number: 21-SIT-01*

**COMMENT OF GSCE ON WORKSHOP RESOURCE PORTFOLIO
ASSUMPTIONS FOR CAISO 20-YEAR OUTLOOK UPDATE**

Additional submitted attachment is included below.

**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

*SB 100 Implementation: Planning for
SB 100 Resource Build.*

21-SIT-01
(May 21, 2021)

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON
WORKSHOP RESOURCE PORTFOLIO ASSUMPTIONS FOR
CAISO 20-YEAR TRANSMISSION OUTLOOK UPDATE**

Golden State Clean Energy (“GSCE”) appreciates the opportunity to submit this comment on the workshop held on June 23, 2023, to discuss resource portfolio assumptions for the California ISO (“CAISO”) to use in its update to the 20-Year Transmission Outlook.

CAISO’s initial 20-Year Transmission Outlook provided an important assessment of the high voltage system’s long-term needs. We applaud all of the Joint Agencies for undertaking this first-of-its-kind study, as it allows California to properly frame and contextualize other planning efforts like the transmission planning process (“TPP”) and integrated resource planning (“IRP”). Now that the IRP-TPP planning cycles are closing in on study timeframes that are approaching 2040, it is prudent to update the 20-year outlook study to examine the full SB 100 report timeframe of 2045 and provide an even more complete picture of the needed infrastructure to allow the state to meet its policy goals. GSCE greatly appreciates the Joint Agencies embarking on this update.

Making the 20-Year Transmission Outlook Actionable

In addition to the 20-Year Transmission Outlook (and the coming update) being useful for contextualizing other planning efforts, GSCE has sought to find ways to make the outlook actionable so the valuable information provided helps inform decision making to the extent reasonable considering the long-term study horizon. Although this study is designed to be higher-level and somewhat limited in scope, the absence of a longer-term vision for the state’s transmission system needs in the SB 100 report makes it important to have this planning document to inform interim decisions and actions taking place in the IRP, TPP, and elsewhere.

GSCE proposes making the 20-year outlook more actionable by allowing the IRP capacity expansion model to consider the transmission facilities included in the 20-Year Transmission Outlook as possible facilities to be selected to increase the resource capacity potential of a transmission zone. These upgrades should be used to supplement CAISO’s transmission capability white paper that already feeds into RESOLVE, thereby providing the model a more robust set of transmission upgrades and bridging the gap between the IRP and longer-term

planning efforts. The current 20-Year Transmission Outlook should feed into this IRP cycle's portfolio development effort, and the future update the 20-year outlook can supplement future portfolio development efforts.

The 20-Year Transmission Outlook suggested a future need for various high voltage transmission facilities that could be needed in the IRP's planning timeframe. CAISO should provide the Public Utilities Commission with any additional information needed to accompany these transmission facilities so the facilities can be included in the CAISO's newest version of the transmission capability white paper. For instance, CAISO's 2021 transmission capability estimates white paper showed the Manning Substation as one of the possible ADNUs RESOLVE could select, and the initial 20-year outlook shows the eventual need for the 500/230 kV Westland Substation. The Manning Substation received nearly 19 GW of commercial interest in the first generation interconnection cluster study application window in which it was available (i.e., Cluster 15), highlighting the strong commercial interest that exists in this least regrets renewable resource zone. Providing RESOLVE the ability to consider an asset like the Westland Substation helps the IRP, which drives actual decision making, to be explicitly informed by the state's longer-term planning efforts and better ensures that intermediate decisions are in furtherance of California's ultimate policy goals.

Other Assumptions

Slide 39 from the June 23 workshop presentation appears to note that a 15-mile buffer zone around substations is evaluated for siting of solar resources. GSCE urges the Joint Agencies to not limit least regrets renewable resource zones from concentrated resource development by including such a limiting assumption. Projects have and will continue to find economical ways to access substations with generation tie-lines that are longer than 15 miles long, given markets are increasingly driving larger scale solar projects that can make longer gen-tie lines viable. Further, in areas like the Central Valley, the proximity to newly planned substations may be a condition of where it is more feasible to locate generation on marginal or drainage impaired farmland that is supported by the agricultural community.

This buffer zone may prevent certain areas from accumulating capacity additions, which in turn drives resources elsewhere and thus transmission will be developed elsewhere. If resources were allowed to concentrate more in one area for development, it could highlight the need for additional substations and allow more resources to be modeled in areas with strong policy support but where current transmission limits make it harder for models to locate the resources.

Conclusion

GSCE strongly supports the effort of the Joint Agencies to update the 20-Year Transmission Outlook. GSCE looks forward to continuing to be a part of California's decarbonization efforts.

Dated: June 26, 2023

Respectfully submitted,

/s/ Daniel Kim

Daniel Kim
VP, Governmental & Regulatory Affairs
Ian Kearney
Director of Regulatory Affairs
Golden State Clean Energy, LLC
3857 Birch Street, Suite 441
Newport Beach, CA 92660
Phone: (916) 709-9289
dan@goldenstatecleanenergy.com
Phone: (559) 246-8973
ian@goldenstatecleanenergy.com