

DOCKETED	
Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	250980
Document Title:	ACP-California Comments on Resource Portfolio Assumptions for the CAISO 20-Year Transmission Outlook
Description:	N/A
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Submitter Role:	Applicant Representative
Submission Date:	7/7/2023 4:17:09 PM
Docketed Date:	7/7/2023



**ACP-California Comments on Resource Portfolio Assumptions
For The CAISO 20-Year Transmission Outlook
Docket No. 21-SIT-01**

American Clean Power – California (“ACP-California”)¹ appreciates this opportunity to provide the following comments for consideration by the California Energy Commission (“CEC”) on the June 23, 2023 Workshop on Resource Portfolio Assumptions for the Next CAISO 20-Year Transmission Outlook (“20-year outlook”).

ACP-California supports long-term proactive transmission planning. ACP-California applauds the agencies’ collaboration and efforts to update the 20-year outlook. We generally agree with the refinements to the 2021 20-year outlook portfolios (e.g., to account for higher electrification load and coordination with Assembly Bill 525 planning). However, due to the short timeframe for comments and intervening holiday, we are not able to provide specific feedback on the final portfolios set forth on Slide 35 of the Energy Division Staff Presentation. Instead, these comments focus on policy recommendations on the use and implementation of the 20-year outlook.

ACP-California has been advocating for improvements in transmission planning and development for multiple years, and we have submitted numerous comments on this topic to the California Independent System Operator (“CAISO”), California Public Utilities Commission (“CPUC”), and most recently to the CEC for the AB 525 Workshop Assessing Transmission Upgrades and Investments for Offshore Wind permitting.² Ongoing interconnection delays and

¹ The American Clean Power Association (“ACP”) is the national voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high-tech innovation across the United States. ACP’s mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, and transmission assets to power a clean and renewable economy for California and the West.

² ACP-California is actively participating in other transmission-related processes and has filed comments with discrete recommendations on transmission / interconnection reform in the following venues:

- CEC Workshop on AB 525 - Assessing Transmission Upgrades and Investments for Offshore Wind Development, June 26, 2023, Comments here: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=250745&DocumentContentId=85559>
- CEC 2023 IEPR, May 23, 2023 Comments on Bulk Transmission Issues here: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=250290&DocumentContentId=85019> CAISO
- CAISO Interconnection Process Enhancements, March 27, 2023 Comments here: <https://stakeholdercenter.caiso.com/Comments/AllComments/b6ed131c-ecaa-460d-8316-e0e0dcd0373f#org-5097e698-2a91-4550-b16e-1cda35ad26b9>

over-subscribed interconnection are clear indications of the need for proactive planning and right-sizing of network upgrades. The 20-year outlook could play an integral role in resolving these issues, but the plan must be actionable. As discussed below, ACP-California recommends integrating the findings of the 20-year outlook in this year’s CAISO Transmission Planning Process (“TPP”) and working with the utilities to develop an implementation plan and rubric for evaluating and addressing delays in long-term transmission development.

1. The Agencies Should Ensure the 20-Year Transmission Outlook Is Actionable.

ACP-California echoes other stakeholder comments requesting the CAISO 20-year outlook be actionable and integrated into agency decision making on transmission approvals.³ The 20-year outlook should more directly inform the TPP and the CPUC’s Integrated Resources Planning Process (“IRP”) by “right-sizing” the state’s transmission system needs in the near term. The 20-year outlook should feed directly into the TPP and IRP base cases. This will enable the state to connect near-term planning decisions with longer-term reliability, affordability, and decarbonization objectives. Proactive long-term planning will ensure that resources can be interconnected and receive deliverability in a timely fashion and will help resolve issues with impacted interconnection clusters. In addition to integrating the findings of the 20-year outlook into the IRP and TPP, the State should provide near-term actionable recommendations for the agencies, balancing areas, and load-serving entities.

As noted in the workshop, the CAISO’s 20-year outlook is a key link between the TPP planning cycles and the necessary long-term planning approach in California. The 2022-2023 Draft Transmission Plan notes that it evaluates the cost of transmission projects against the 20-year outlook and the CPUC’s IRP, but fails to include specific analysis of the 20-year outlook. The CEC should continue to work closely with the CAISO throughout this year’s TPP to ensure that the state is able to move past iterative planning and special studies toward a comprehensive approach to transmission planning across a 20-year horizon, and project approvals in this year’s TPP account for right-sizing the needs identified in the 20-year outlook. This level of forecasting within the current planning cycle will enable selection of the best “no regrets” approvals and will help developers with active interconnection requests and others seeking Maximum Import Capability allocations to understand how and when future capacity may be added.

2. The CEC, CPUC and CAISO Should Develop a Transmission Implementation Plan and Development Rubric to Provide Transparency and Mitigate Future Delays.

In order to better analyze upgrades resulting from the TPP and 20-year outlook, ACP-California suggests that the agencies use the 20-year outlook and work with the large investor-owned utilities (“IOUs”) to develop an implementation plan. The CPUC has already developed a rubric for determining the exact status of transmission projects (i.e., the recently adopted Transmission Plan Review (“TPR”) process (Resolution E-5252)). The goal of the implementation plan and rubric would be for IOUs to provide a clear and easily-tracked progress

- CPUC IRP Transmission Planning Process, February 2, 2023 Comments on Inputs and Assumptions here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K872/501872308.PDF>

³ See comments of Golden State Clean Energy on Workshop Resource Portfolio Assumptions for CAISO 20-Year Transmission Outlook Update, available here: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=250746&DocumentContentId=85560>

chart that would also create a level of accountability and transparency. The agencies should take the results of the 20-year outlook and evaluate through the TPR rubric the potential different reasons for delays a transmission owner (“TO”) might provide – for example, whether the TOs have sufficient financial and human capital to execute on the upgrades on time, when long lead-time purchases for each project need to be made, and other common rationales for delays.

The rubric should then compare how each TO can route, design, and scope each network upgrade and provide an expected timeline. Ultimately, the TOs should work backward from the identified online dates in the 20-year outlook and outline a step-by-step plan for how they would reach that deadline given the scoping time and the rubrics described above. The rubrics should also analyze the CEC’s and CPUC’s ability to begin as much proactive and programmatic siting as possible while working with the TOs, and where, if at all, the TOs can help expedite that process.

This planning exercise would make the 20-year outlook actionable and identify areas where the state or the TOs must accelerate the timelines provided in the 20-year outlook, especially in areas where acceleration would take less effort and create opportunity for actually meeting the pace and scale of clean capacity build-out that is required by the state’s climate targets. To the extent there are limitations and tradeoffs, the process should identify clear criteria for which projects must be prioritized. This rubric would help the agencies and project developers incorporate realistic timelines for network upgrade development and provide more certainty for projects executing Power Purchase Agreements.

Conclusion

ACP-California supports the 20-year outlook. The agencies should work together to make sure the 20-year outlook is actionable by integrating it into this year’s TPP. We also recommend developing a rubric and action plan to ensure transmission identified in the 20-year outlook is planned, tracked and developed on time.

Respectfully submitted,

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