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GridLiance West Comment on SB100 Analytical Framework Workshop

Additional submitted attachment is included below.

November 14, 2023

RE: Senate Bill 100 Analytical Framework Workshop Comments

TO: California Energy Commission, Public Utilities Commission, and Air Resources Board

GridLiance West LLC (GLW) is a Participating Transmission Owner (PTO) in the California Independent System Operator (CAISO) region that owns and operates approximately 165 miles of 230-kilovolt (kV) high-voltage transmission lines and related substation infrastructure located in rural southern Nevada. The southern Nevada region served by GLW offers extensive renewable resource capabilities, including sites for high quality solar production as well as extensive developable geothermal fields. GLW's service area is appealing for development given reduced costs and fewer regulatory barriers than comparable locations within California. At present, over 20 gigawatts (GW) of solar/storage hybrid, wind, and geothermal resources have submitted requests into the CAISO interconnection process or received executed interconnection agreements to interconnect to the GLW system.

In its previous transmission planning cycle, the CAISO selected extensive upgrades to the underlying, or "core", GLW transmission system to deliver more renewable resource capacity to California. GLW is currently building these approved 230/500 kV transmission facilities across hundreds of thousands of acres of Bureau of Land Management lands.

GLW appreciates the efforts of the California Energy Commission (CEC), Public Utilities Commission (CPUC), and California Air Resources Board (CARB) in pursuing a robust modeling platform for its next Senate Bill 100 (SB 100) analysis. GLW appreciates the opportunity to offer these comments in response to the presentation and discussion at the workshop held on October 31, 2023 (October Workshop).

Overview of Comments

In the workshop, the CEC staff confirmed the CEC's intended use of Plexos tools and EPRI's Regen model for its next SB 100 analysis. In these comments, GLW requests that the CEC adopt assumptions being used by the CPUC for portions of the CAISO's grid that extend beyond the

California state boundary. Specifically, GLW requests that the CEC (1) ensure the transmission topology being used in its models recognizes GLW's transmission system as being part of the CAISO and thereby free of wheeling charges for deliveries to California loads[1] and (2) apply assumptions of renewable resource potentials for those out-of-state areas of the CAISO that have been adopted by the CPUC. GLW urges the CEC to conform its assumptions to those being used at the CAISO and by the CPUC in the Integrated Resource Plan (IRP) process.

Aligning Assumptions with the CAISO and CPUC Warrants Breaking from Generic Data Sets

The CEC has expressed a desire to align assumptions as best possible with the IRP and the CAISO's Transmission Planning Process (TPP) and also has indicated that it plans to employ public, regional data sets. In certain instances, however, these objectives may conflict; notably, assumptions and values used by the CAISO and CPUC will occasionally diverge from the more general public data when more accurate, or more specific, data is available. On these two aspects identified in these comments, the CEC must choose conformance with the more specific CAISO and CPUC assumptions rather than prioritizing the use of generic, regional data.

It Is Important for the CEC to Ensure the Topology of the Models Is Accurate

Regional models and standard Western Electricity Coordinating Council (WECC) databases may fail to capture the nuances of the CAISO grid. To ensure the imputed flows and imputed value of resources to California are accurate, the CEC must ensure that transmission elements within the CAISO are recognized as such. In GLW's case, its system is located within Nevada but it is fully integrated within the CAISO footprint. If the CEC adopts a CAISO topology for its models, this nuance should be properly represented. However, if the CEC begins with another regional topology in either its Regen or Plexos models, the CEC must ensure that wheeling rates for California deliveries are not imposed in the GLW area.[2] Without this, the models would fail to

[1] Deliveries to California load customers from GLW also do not require the allocation of [maximum] import constraint capacity, known as "MIC", required for other out-of-state resource deliveries into California for the benefit of Resource Adequacy accounting purposes. This also makes GLW-located development highly attractive to California loads.

[2] Likewise, there are other transmission elements outside of California but under, or expected to be under, CAISO control.

properly account for the beneficial qualities (e.g., low cost, lower regulatory risk, lower fire danger) of the renewable development underway in southern Nevada, resulting in a less than optimal presumed renewable resource portfolio.[3]

The CEC Should Conform SB 100 Resource Potentials to those of the CPUC for CAISO Regions Outside of California

In its Analytical Workshop presentation, the CEC indicated that it intends to use WECC Risk Class Categories 2 and 3 to determine available land for development. [4] GLW has previously submitted extensive comments to the CEC about the development potential in southern Nevada and the failure of the WECC Level screens to reflect feasible development potentials. See for example, GLW's March 30, 2023 IEPR Land Use Screening Workshop Comments.[5] While the CEC has expressed an interest in developing detailed land-use screens for areas adjacent to California, such screens have not yet been developed at the CEC.

However, the CPUC has made use of improved data sources and has developed resource potentials for non-California CAISO areas that are much more refined those resulting from applying WECC risk screens alone. GLW fully supports the CEC's proposal to conform assumption sets with the CPUC and CAISO and again urges the CEC to adopt the CPUC's resource potentials for non-California CAISO areas until such time as the CEC can fully assess the resource potentials itself. Section 5.2 of the CPUC's Inputs and Assumptions document (most recently published in October of this year) describes the methodology used to generate the potentials, and Table 33 summarizes the potentials by resource technology for all of the CAISO-interconnecting regions, including those outside of California.

[3] While GLW renewable resources are technically "out-of-state" from a wheeling cost perspective the CPUC models treat GLW renewables like other "in-state" resources are treated.
[4] Slide 26.
[5] CEC Docket 21-SIT-01.
https://efiling.energy.ca.gov/GetDocument.aspx?tn=250954&DocumentContentId=85899.

Summary

GLW appreciates the effort of the CEC staff to develop robust analytical tools for the CEC's SB 100 planning processes. In seeking optimal tools and methods, however, GLW urges the CEC to align its network topology with that used by the CAISO and CPUC, and resource potentials of CASIO-interconnected out-of-state regions to those developed by the CPUC in its IRP processes.

Sincerely,

/s/ Jaime Hoffman

Jaime Hoffman
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