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**Comments from the Public Advocates Office on SB 319 Guidebook**

*Additional submitted attachment is included below.*



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## **Comments from the Public Advocates Office on the November 15<sup>th</sup>, 2024 Joint Agency Presentation on Senate Bill 319 Transmission Infrastructure Planning and Permitting Guidebook**

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) appreciates the opportunity to provide comments regarding the interagency effort to prepare the Senate Bill (SB) 319 Transmission Infrastructure Planning and Permitting Guidebook and the associated November 15, 2024 California Energy Commission (CEC)/California Public Utilities Commission (CPUC)/California Independent System Operator (CAISO) presentation. Cal Advocates is an independent ratepayer advocate with a mandate to obtain the lowest possible rates for utility services, consistent with reliable and safe service levels and the state's environmental goals.

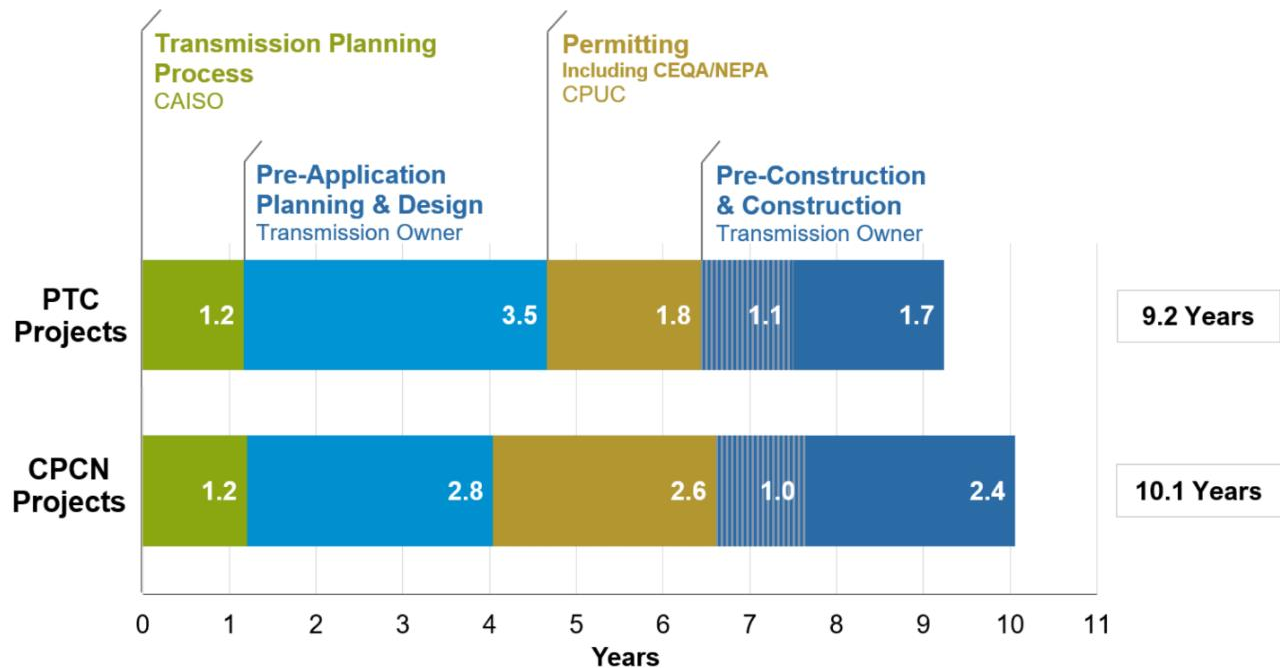
At the November 15 workshop, presenters discussed the SB 319 Transmission Infrastructure Planning and Permitting Guidebook's inclusion of an analysis of the average timeframes for transmission infrastructure planning and permitting.<sup>1</sup> Cal Advocates has analyzed the average length of transmission project phases for transmission projects permitted at the CPUC (the results of this analysis are shown below in Figure 1). Based on our review of 54 transmission projects permitted at the CPUC between 2002-2024, large transmission projects in California generally take about a decade to design, permit, and build.<sup>2</sup>

On October 23, 2024, Cal Advocates published the first version of its Transmission Data Dashboard (available at <https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/transmission-data-dashboard>) which includes this analysis. The dashboard offers a snapshot of the status of California's electric transmission network infrastructure.

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<sup>1</sup> Senate Bill 319 – Transmission Infrastructure Planning and Permitting Guidebook CEC/CPUC/CAISO Joint Agency Presentation, November 15, 2024 at p. 4.

<sup>2</sup> Public Advocates Office Transmission Dashboard, Transmission Development Timelines, October 23, 2024, at p. 6. Available at <https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/transmission-data-dashboard>.



**Figure 1.** Transmission Development Timelines (from Cal Advocates’ Transmission Data Dashboard)

The transmission timeline development data in particular illustrates that long transmission development timeframes are generally not attributable to one single process. In fact, permitting at the CPUC is only 25% of the average project development timeline, whereas 33% of the average project development timeline is spent waiting for project permitting applications to be submitted to the CPUC. Moreover, the majority of the average transmission project development process is under the control of the transmission developer. These findings are congruent with the [CEC’s recent analysis of Transmission Process Review \(TPR\) data](#).

Cal Advocates recommends that the joint agencies consider the findings of this timeline analysis when preparing the chapters on transmission infrastructure planning and permitting timeframes in the forthcoming SB 319 Transmission Infrastructure Planning and Permitting Guidebook.<sup>3</sup>

<sup>3</sup> The underlying data used to create Cal Advocates’ timeline figure can be made available upon request.