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Comment Received From: Ellen Wolfe
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GLW cover comments in Word - Fully searchable

This submission includes a Word version of the .pdf file submitted which was not fully searchable. Attachments have been omitted from this submission.

Additional submitted attachment is included below.

September 15, 2020

RE: SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future, Docket #: 19-SB-100. Results Workshop Comments from GridLiance West LLC

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

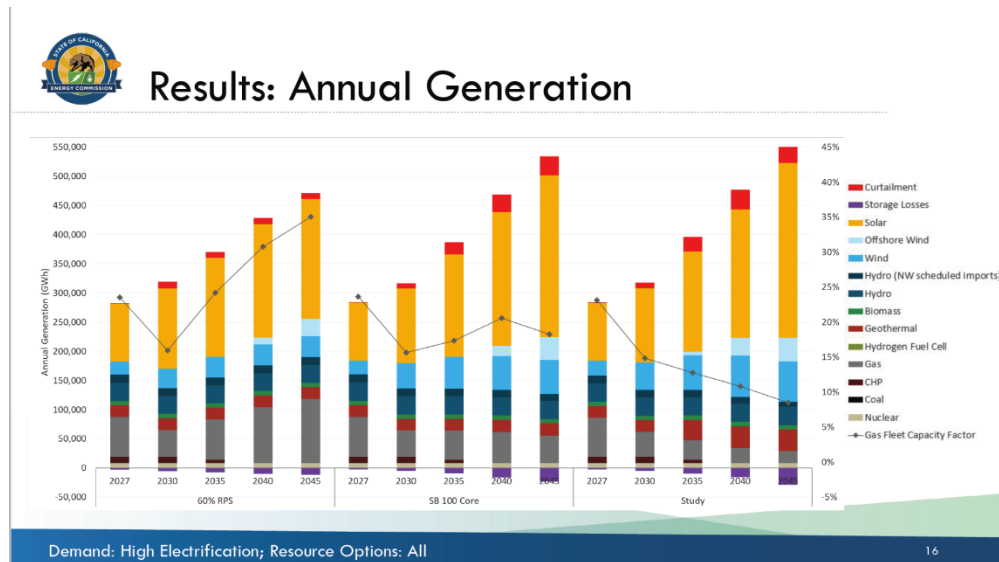
GridLiance West was formed to partner with electric cooperatives, municipal utilities, joint action agencies, irrigation districts, and renewable energy developers in the California Independent System Operator (CAISO) region in order to unlock the financial value of existing transmission assets as well as to invest in transmission projects with GridLiance West's partners. GridLiance West owns and operates approximately 165 miles of 230-kilovolt (kV) high-voltage transmission lines and related substation infrastructure within the CAISO footprint but located in rural Southern Nevada. GridLiance West is a non-load-serving Participating Transmission Owner (PTO) in the CAISO. The region that GridLiance West serves encompasses significant lands available for ready permitting of solar/storage hybrid, wind and geothermal energy. There are currently 3,097 MW of signed interconnection requests or Large Generator Interconnection Agreements in place of renewable energy waiting to interconnect to the CAISO on GridLiance West's system.

GridLiance West appreciates the significant effort that the California Energy Commission (CEC), Public Utilities Commission (CPUC) and Air Resources Board (CARB) have put into the SB100 study and the thorough and professional manner in which the work has been conducted and vetted.

We appreciate the opportunity to offer these comments in response to the preliminary results discussed at the September 2, 2020 workshop (September Workshop).

GridLiance West Agrees That Quick Action Is In Order

From GridLiance West’s perspective, a central theme emerged from the workshop: near-term buildout of no-regrets renewable sources to serve California will be incredibly beneficial. The study analysis shows that under either the Core Assumptions or the somewhat more aggressive “Study” scenario assumptions, a higher level of buildout in the early years dramatically reduces the need for fossil production.¹



GridLiance West agrees with other workshop commenters that near-term action by the agencies is critical, and that action must be taken today. For example, Bernadette Del Chiaro from California Solar and Storage stated that “we need sustained buildout to meet the goals, but that we’re not on [that path] today.”² Additionally, Alex Morris indicated that getting started in pursuing no-regrets actions is critical, and that the state risks analysis paralysis which will cause [meeting the state’s goals] to be more

¹ SB100 Draft Results Presentation, September 2, 2020. TN-234549 (Results Presentation), p. 16.

² Workshop [video transcription](#) at 03:07:15.

challenging if we don't start now.³ Shannon Eddy also commented that hesitation is one of the biggest barriers we face⁴ and that the transmission system must be able to support the delivery of new renewable energy coming online.⁵

The reality is that, if action does not result from the agencies' activities this year to ensure that the build out of renewable energy happens and that the new energy can be delivered through the CAISO grid, then collectively we are losing ground on meeting the state's goals.

Transmission Is Critical to Meeting SB100 Goals

As mentioned above, Shannon Eddy from the Large-Scale Solar Association commented at the workshop regarding the need for upgrades to the transmission system to support the renewable development.

Similarly, Danielle Mills from the American Association of Wind Energy commented that there are over 1400 MWs of transmission upgrades that would allow additional renewable energy to come online now.⁶ GridLiance West supports these statements. The CAISO has studied renewable portfolios in several of its last Transmission Planning Process (TPP) cycles, yet policy projects are not getting approved and the solution to further concentration of renewables on the system seems to be to apply "remedial action schemes," effectively curtailing the generation. The current CAISO planning guidelines call for any such scheme to curtail no more than the largest single contingency, currently one Diablo Canyon unit at 1150 MW. Thus, these remedial schemes are not effective techniques for managing transmission contingencies in areas with significant renewable penetration.

The CAISO has many avenues to allow it to delay approving transmission upgrades, and delaying approval is a lower risk solution for the CAISO. Yet in policy processes, including this workshop and the CPUC's

³ Workshop [video transcription](#) at 03:50:41 – 03:51:23.

⁴ Workshop [video transcription](#) at 03:06:08.

⁵ Workshop [video transcription](#) at 03:05:06 – 03:05:13.

⁶ Workshop [video transcription](#) at 03:06:08.

Integrated Resource Planning (IRP), the CAISO has asked repeatedly for clear, actionable, guidance.⁷ The CAISO seems to recognize that putting off transmission buildout decisions is becoming untenable. At the same time, the CAISO needs the support of the other agencies regarding CAISO approval for these near-term no-regrets choices.

GridLiance West has submitted transmission upgrade study requests to the CAISO in the past several cycles. While the CAISO has not found sufficient “need” for these projects, the CPUC’s IRP process can only include a fraction of the available build out and available queue resources until the transmission is upgraded. All agencies involved need to coalesce and convey to the CAISO that it is acceptable for them to recommend transmission upgrades that will cost-effectively enhance the ability for loads to make use of the renewable and storage projects shown by the SB 100 and IRP studies to be needed to meet climate goals.

Transmission Enhancements Create High Quality Jobs and Provides Benefits to DACs

GridLiance West appreciates the workshop presentation and statements of Shrayas Jatkar from California Workforce Development. GridLiance West notes that it is not only the renewable projects, but also the transmission needed to support energy delivery from the renewable projects, that creates impactful jobs and contributes to disadvantaged communities (DACs).

The first phase of GridLiance West’s Silverado project – which includes a set of transmission upgrades submitted to the CAISO for study in the 2020-2021 TPP – will create 2,039 new jobs for California residents even though the phase I construction is in Nevada, according to a July 2020 economic impact study conducted by Blue Sky consulting group that is included with these comments. (As expected, the study also shows that additional jobs and economic benefit would also accrue to Nevada.) The International

⁷ Workshop [video transcription](#) at 04:04:10 – 04:05:02.

Brotherhood of Electric Workers (IBEW) CA Locals 47 and 1245, along with NV Locals 396, 357 and 401, also support the GridLiance West transmission projects.⁸ These projects will ensure that IBEW workers can keep career-track jobs in the midst of the COVID pandemic.

Further, the area where the transmission projects will be built (e.g., Pahrump, Amargosa and Nye County generally), and where additional renewable energy and storage projects would thereby be able to interconnect, are considered DACs by measure of median income and likely by other measures as well.⁹

GridLiance West appreciates the ability to submit these comments and would welcome the ability to discuss these issues with the Agency or otherwise participate in the SB100 study.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M Landgraf', is set against a background of a dense, multi-colored confetti pattern.

Michael Landgraf
President
GridLiance West

⁸ IBEW letters of support are also included with these comments.

⁹ It is not entirely clear whether impacts of SB 100 for DACs outside of California are being considered. It would, however, seem counter to the underlying goals of DAC treatment to fully disregard the welfare of DACs within the CAISO footprint, directly neighboring California, but not in California.