

DOCKETED

Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	242250
Document Title:	California Western Grid Development Comments - on 02-22-22 Joint Agency SB 100 Workshop
Description:	N/A
Filer:	System
Organization:	California Western Grid Development
Submitter Role:	Public
Submission Date:	3/10/2022 3:52:47 PM
Docketed Date:	3/10/2022

*Comment Received From: California Western Grid Development
Submitted On: 3/10/2022
Docket Number: 21-SIT-01*

CWG Comments on 022222 Joint Agency SB 100 Workshop

Additional submitted attachment is included below.



March 10, 2022

California Energy Commission
Attention: Docket Office
715 "P" Street
Sacramento, CA 95814

COMMENTS OF CALIFORNIA WESTERN GRID DEVELOPMENT, LLC

**DOCKET 21-SIT-01: FEBRUARY 22 JOINT AGENCY TO PLAN FOR SB 100 RESOURCE BUILD—
LAND USE IMPLICATIONS**

California Western Grid Development, LLC (CWG) is an Independent Transmission Developer that is developing the proposed Pacific Transmission Expansion Project ("PTE Project" or "PTEP"). The PTE Project is a 2,000 MW controllable HVDC subsea transmission cable that the California Independent System Operator ("CAISO") has found will allow any new or existing supply of renewable power and energy available to the Diablo Canyon 500 kV switchyard to be delivered to the West Los Angeles Basin and Big Creek Ventura areas. PTEP will reduce local capacity requirements (the need to rely on local capacity) and allow for new clean energy to be delivered into Los Angeles.

California Western Grid (CWD) appreciates the opportunity to comment on the Joint Agency's February 22, 2022, Workshop to review land use implications for SB 100 resource needs. CWG applauds the Joint Agencies continued collaborative planning and analysis to identify California lands with potential to accommodate the infrastructure for the unprecedented build pace required over in the next several years to reach California's clean energy goals. Our comments address a few observations and recommendations regarding turning *planning into action* -- a theme we noted was widely expressed by both the Joint Agencies and stakeholders.

Firstly, CWG applauds the holistic nature of the planning mechanisms underway to consider the land use impacts alongside existing and planned energy infrastructure that will be required to both supply and deliver approximately 173,000 MW of *new* clean energy resources in just a *couple of decades*. The CAISO 20-Year Outlook is a critical complement to the Joint Agencies land analysis.

While we applaud the Joint Agencies land use mapping activities, we are concerned about any further delay in identifying and approving needed transmission. Transmission can easily take 10 years or more to plan and build.

CWG is concerned that continued planning is not translating quickly enough into actions. The Workshop presentation suggests that needed transmission identified by the Joint Agencies land use mapping exercise will not be identified until the 2023-24 TPP at the earliest.

CWG respectfully recommends more immediate action. There are two categories of new transmission needed. The first is to bring renewable energy from where it is generated to the bulk electric transmission system. The second category is transmission needed to bring power from the Bulk Power Transmission System to transmission-constrained urban load centers. Particularly with reference to the second category of transmission (from the bulk grid to constrained load centers), there is no need to wait for the land use analysis to be finished; it is not needed in the near term for this second category of transmission. Transmission projects that bring power from the bulk power system to transmission constrained urban load centers have already been identified in the CAISO 20-year Transmission Outlook. Some of those projects can, and should, get started in the current CAISO Transmission Planning Process (TPP) 2022-23 cycle.¹

Building new transmission pathways from California's bulk transmission system to California's largest constrained load centers will complete the path. It will allow clean energy that has been delivered to the bulk transmission system from just about anywhere in California to find its way to load centers where it is needed. Importantly, this second category of transmission that will deliver power from the bulk system to the major load centers is "least regrets," i.e., it will be needed regardless of the geographic area where new generation resources are located. In summary, CWG applauds the continued collaborative work amongst the Agencies to plan for SB 100 goals. However, as CEO Mainzer mentioned at the workshop, "we have established the relationships and framework to take this work forward." In that regard, CWG urges concrete action now, beginning with the 2022-23 TPP cycle, to approve new "least regrets" transmission immediately, allowing for delivery of significant amounts of new clean energy into California's major urban load centers in Los Angeles and San Francisco. The unprecedented requirement of 173,000 of MW of new clean resources over the next several years must be met with equally unprecedented speed and action. The contemplated Joint Agency land analysis is certainly needed. However, it should take place alongside of approving the essential transmission into constrained load centers identified in the 20-Year Transmission Outlook.

New transmission into our major load centers is the *cornerstone* of any cost-effective, reliable clean resource planning scenario that can meet our clean energy goals. And, while planning is good, action is better, indeed essential.

Thank you again for the opportunity to present our views.

Respectfully,

/s/

Martin Walicki

mwalicki@tred-llc.com

On behalf of California Western Grid Development, LLC

2112 East Ganson Street

Jackson, MI 49202

(240) 277-8968

