

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-IEPR-03
<b>Project Title:</b>	Electricity Forecast
<b>TN #:</b>	246730
<b>Document Title:</b>	Calpine Energy Solutions, LLC Response to Electric Transmission-Related Data Collection Request
<b>Description:</b>	N/A
<b>Filer:</b>	Eric Janssen
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Intervenor Representative
<b>Submission Date:</b>	10/21/2022 2:12:01 PM
<b>Docketed Date:</b>	10/21/2022

October 21, 2022

California Energy Commission  
2022 Integrated Energy Policy Report Update  
Via Electronic Filing

Re: Calpine Energy Solutions, LLC Response to Electric Transmission-Related Data Collection Request (22-IEPR-03)

On July 5, 2022 the California Energy Commission 2022 Integrated Energy Policy Report Staff issued Final Instructions for Electric Transmission-Related Data Collection, requesting,

information on new or upgraded transmission required to deliver energy from contracted resources, generators, or power purchase agreements (PPAs) needed by load-serving entities (LSEs) to meet Renewable Portfolio Standards and the state's Senate Bill 100 (SB 100, De Leon, Chapter 312, Statutes of 2018) goals. For resources within and outside California, the CEC requests the identification of the generating resource and general information on any new or upgraded transmission required to deliver energy from the resource.<sup>1</sup>

The instructions provide that, "LSEs and transmission owners that are part of the California ISO balancing authority can rely on the California ISO Transmission Planning Process for transmission information."<sup>2</sup>

Calpine Energy Solutions, LLC ("Calpine Solutions") is a CPUC jurisdictional LSE that serves California customers that are only located in the CAISO balancing authority. Calpine Solutions does not develop transmission or distribution facilities. Calpine Solutions has no contracts with generating facilities that will require new or upgraded transmission for energy deliveries to the CAISO. While Calpine Solutions does contract with out of state facilities that are not directly connected to the CAISO grid in order to meet its RPS requirements, the nature of the energy products associated with those contracts does not require any need for new or upgraded transmission facilities to ensure deliverability of those out of state contracted resources to the CAISO. Regardless, Calpine Solutions only contracts with facilities that are either directly connected to the CAISO Balancing Area for resource adequacy purposes or have sufficiently firm transmission to deliver to the CAISO. Accordingly, Calpine Solutions refers the Commission Staff to the CAISO's Transmission Planning Process for transmission development matters.

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<sup>1</sup> Hesters, Mark. July 2022. *Instructions for Electric Transmission-Related Data Collection*. California Energy Commission. Publication Number CEC-200-2022-004 ("Instructions"), at page 3.

<sup>2</sup> Id., at page 6.

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Calpine Solutions appreciates this opportunity to assist the Commission. Please contact me directly via email at [greg.bass@calpine.com](mailto:greg.bass@calpine.com) if you have any questions.

Sincerely,

/s/

Greg Bass  
Regulatory Director  
Calpine Energy Solutions, LLC