

<b>DOCKETED</b>	
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<b>Project Title:</b>	Electricity Forecast
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<b>Filer:</b>	Aisha Cissna
<b>Organization:</b>	Redwood Coast Energy Authority
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December 6, 2022

Attn: Drew Bohan  
Executive Director  
California Energy Commission  
1516 9th Street  
Sacramento, CA 95814

**RE: Redwood Coast Energy Authority's Response to California Energy Commission's  
Transmission Related Data Request**

Director Bohan,

Pursuant to the California Energy Commission's ("CEC") transmission data request detailed in its Final Staff Report on Instructions for Electric Transmission-Related Data Collection issued on July 5th, 2022, load-serving entities ("LSE") are required to report on new and upgraded transmission needed to deliver energy from contracted resources, generators, and power purchase agreements to help the CEC identify transmission lines of value. The CEC established October 21, 2022 as a deadline; however, subsequent staff correspondence allowed for late filing. On November 16, 2022, CEC staff approved RCEA's request to late file by December 6, 2022.

As a community choice aggregator ("CCA"), Redwood Coast Energy Authority ("RCEA") is a CPUC-jurisdictional entity that exclusively serves customers within the CAISO balancing authority area. RCEA does not own, operate, or maintain transmission facilities. RCEA relies on the CAISO Transmission Planning Process ("TPP") for the planning and construction of transmission facilities affecting its customers and contracted resources. Therefore, RCEA is providing a limited response to the CEC's request for Electric Transmission-Related Data Collection due to RCEA's position as a CCA.

In response to question four that seeks information on facilities necessary to achieve state climate goals, RCEA notes that delays in PG&E's transmission and distribution upgrades in its service territory are currently preventing the addition of new electric load which in turns hinders the region's ability to meet climate goals. Specifically, new load is unable to interconnect in parts of southern Humboldt County and northern Mendocino County. This is expected to stall the electrification of vehicles and buildings in the region, posing challenges to decarbonization efforts. Specifics are contained in the table below:

Location	Summary of Issues
Eureka to Bridgeville; Bridgeville to Willits	60kV lines (with spurs) and substations are experiencing transmission-level problems. Customers served by associated distribution lines are impacted; limited to no ability to interconnect new electric load.
Eel River Valley	PG&E has delayed transmission and substation level upgrades limiting the ability to interconnect new electric load. PG&E has indicated that \$16M in upgrades will be completed by the end of 2024. Currently there are 13 outstanding applications in the queue in this area with ~60 additional future interconnections that are subject to impact.
Bridgeville to Alderpoint	PG&E has delayed transmission and substation level upgrades limiting the ability to interconnect new electric load in this region. This issue is impacting 23 applications in the queue plus three anticipated applications. PG&E has indicated it will complete \$20M in distribution and transmission upgrades to resolve problem by 2026. These upgrades should create additional capacity in/around Garberville area in Humboldt County.
Garberville to Petrolia	43 new customers currently cannot be served due to PG&E's failure to complete transmission upgrades. PG&E would need to complete \$300M in upgrades to serve impacted customers. Transmission from Bridgeville to Garberville needs to be rebuilt and new distribution lines are needed from Garberville to Briceland and Petrolia.

Furthermore, current limits to transmission capacity to the Humboldt Local Capacity Area will impede full build-out of the Humboldt offshore wind energy area. Numerous upgrade options have been identified in studies conducted by the Schatz Energy Research Center which in turn have ultimately informed CAISO's TPP<sup>1</sup>.

Enclosed as Attachment A, please find RCEA's report for new and upgraded transmission required for its currently contracted projects including the location, capacity, and type of

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<sup>1</sup> See Section 3.7.2.2 of CAISO's 2021-2022 Transmission Plan for discussion of upgrade options to accommodate offshore wind development off the Humboldt coast.

transmission upgrade needed. This table serves as a response to question number five in the data request.

RCEA also notes that issues with the interconnection queue process are posing numerous challenges on many California LSE's ability to meet policy goals in a timely and economic manner. Other challenges include the uncertainty of evolution for the CAISO's Maximum Import Capability (MIC) process and its effect on RCEA's confidence to sign long term contracts outside of the CAISO balancing authority.

For additional detail on RCEA's transmission upgrade needs, please see Section III.n (Transmission Planning) of RCEA's 2022 Integrated Resource Plan.<sup>2</sup>

RCEA hereby confirms that it is not claiming confidentiality for any portions of this response

If there are any questions or concerns regarding any of the information provided, please feel free to contact the signatory listed below.

/S/ Aisha Cissna

Aisha Cissna

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<sup>2</sup> RCEA's 2022 Integrated Resource Plan: [https://redwoodenergy.org/wp-content/uploads/2022/11/20221101\\_RCEA\\_2022\\_IRP.pdf](https://redwoodenergy.org/wp-content/uploads/2022/11/20221101_RCEA_2022_IRP.pdf)

# **Attachment A**

Reporting LSE Name	Project Name	Technology Type	Project Development Status	City	County	State	Contract Length (Years)	Contract Execution Date	Nameplate Capacity (MW)	Contract Capacity (MW)	Commercial Operation Date (COD)	New/Upgraded Transmission	Project Notes
Redwood Coast Energy Authority (RCEA)	Sandrini Solar 1	Solar	Construction	Bakersfield	Kern	CA	15	5/5/2020	100	100	6/1/2023	PG&E is currently constructing the final portion of the required transmission line that is within their property of the Wheeler Ridge Substation, which is tentatively scheduled to be completed in Q1 of 2023. A material modification amendment to the large generator interconnection agreement with PG&E and CAISO is underway for the project to interconnect at higher voltage than was originally anticipated.	
Redwood Coast Energy Authority (RCEA)	Ormat Geothermal Portfolio	Geothermal	Pre-Construction	Multiple	Multiple	NV & CA	20	5/31/2022	125	4	6/1/2024	The developer is still characterizing the portfolio resources so no projects have officially been adopted into the portfolio yet. However, one potential resource that could be developed in CAISO, located at the Geysers in Sonoma County, recently received Phase 1 study results in Cluster 14 indicating that it will be impacted by a costly network upgrade with a potential completion date no earlier than 2029. The timing of the network upgrade may require this resource to be substituted with an import resource.	RCEA is part of California Community Power ("CC Power"), a Joint Powers Authority made of 10 CCAs to combine their buying power to acquire new large-scale and long-lead resources. RCEA will receive a portion of the various geothermal projects developed under this agreement with Ormat Nevada, Inc.
Redwood Coast Energy Authority (RCEA)	Fish Lake Geothermal	Geothermal	Pre-Construction	Dyer	Esmeralda	NV	20	5/31/2022	13	0.36	6/1/2024	Upgrades to the Silver Peak substation are required. The developer has secured transmission to Utah, where the buyers have secured 2023 MIC in preparation for a long-term MIC reservation. However, less expensive import options are being explored by CC Power members contracting for Fish Lake in the event that capacity on more preferred branch groups becomes available.	RCEA is part of California Community Power ("CC Power"), a Joint Powers Authority made of 10 CCAs to combine their buying power to acquire new large-scale and long-lead resources. RCEA will receive a portion of the various geothermal projects developed under this agreement with Open Mountain Energy.