

DOCKETED

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*Comment Received From: Three Rivers Energy Development LLC
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CWG Comments on the May 4th Workshop

Additional submitted attachment is included below.

TO: California Energy Commission

By email to: Docket@energy.ca.gov.

Subject: Docket Number 23-IEPR-04; “Accelerating Interconnection with the Bulk Power System”

Comments of California Western Grid on May 4th Workshop: “Accelerating Interconnection with Bulk Power System”

May 23, 2023

Three Rivers Energy Development, LLC (TRED) is an Independent Transmission Developer that is developing the Pacific Transmission Expansion Project (“PTE Project” or “PTEP”) on behalf of California Western Grid Development, LLC. (“California Western Grid” or “Cal Western”). The PTE Project is a 2,000 MW controllable HVDC subsea transmission cable that the California Independent System Operator (“CAISO”) has found will allow new and existing supply, available to the Diablo Canyon 500 kV switchyard, including new offshore wind (OSW) delivered to the LA Basin and Big Creek Ventura areas to reduce local capacity requirements while also solving other significant issues. The PTE Project is described in Section 4.8.8 of the 2020-2021 CAISO Transmission Report issued March 24, 2021. The PTE Project is also currently being evaluated by the CAISO as part of 2022-2023 CAISO Transmission Planning Process (“TPP”).

California Western Grid hereby submits these comments in support of those submitted by the Center for Energy Efficiency and Renewable Technologies (CEERT)¹ regarding the urgent need for transmission; the CAISO’s new approach to zonal solutions; and the need for connections from the central valley to the Los Angeles (“LA”) Basin to deliver Central Valley solar energy to the large LA market. In this regard, we could not agree more with CEERT’s statement that:

¹ CEERT Comments submitted May 9, 2023, Docket No. 23-IEPR-04 at Page 1.
<https://www.energy.ca.gov/event/workshop/2023-05/commissioner-workshop-clean-energy-interconnection-bulk-grid>

We strongly believe that the attention of state energy policy makers is urgently required to identify and effectuate solutions that will accelerate the deployment of clean energy resources to the bulk power system in order to meet California's climate goals. At the recent May 4 Commission workshop, it was made absolutely clear that California needs to sustain deployment of renewable power sources and battery energy storage systems at unprecedented levels of at least seven gigawatts annually for the next decade. In order to meet this level of deployment California's bulk transmission system will need to be transformed in a very fundamental way.²

These unprecedented amounts of new energy that will triple the resources connected to the grid in order to meet the State's clean energy goals was first pointed out in the Commission's Joint Agency Report to the Legislature in 2021.³ The CAISO's first ever 20-Year Transmission Outlook then reported that \$30.5 billion of new transmission would be needed to accommodate these new resources.⁴ Relying on both these studies the Legislature unanimously approved, and the Governor signed Senate Bill 887⁵ which found an urgent State public policy need for new transmission into transmission constrained load centers. In response, the CAISO's April 3, 2023, Draft Transmission Plan for the 2022-2023⁶ transmission planning period approved \$9.3 billion of new transmission. Western Grid has commended CAISO for these bold steps forward. However, we also agree with CEERT's support for the CAISO's new zonal approach to transmission planning and with CEERT's recommendation that:

It includes a focus on opportunities to develop the abundant solar potential in the lower Central Valley through major upgrades to Path 15 and connections to the Greater Bay Area and the Los Angeles Basin.⁷

The CAISOs in its 20-Year Transmission Outlook found that PTEP subsea line is an example of a line that is needed from Diablo Canyon to the LA Basin.⁸ In its April 3, 2023, Draft 22-23 Transmission Plan the CAISO also found that PTEP will reduce congestion on Path 26:

The project can provide improved access to future offshore wind development, offload congestion on Path 26, and reduce gas-fired generation local capacity requirements.

² CERT Comments in this docket at p. 1.

³ <https://www.energy.ca.gov/sb100>

⁴ Page 57; <http://www.caiso.com/InitiativeDocuments/Draft20-YearTransmissionOutlook.pdf>

⁵ Senate Bill 887 "Accelerating Renewable Energy Delivery Act" ("SB 887").

⁶ <https://stakeholdercenter.caiso.com/RecurringStakeholderProcesses/2022-2023-Transmission-planning-process>

⁷ *Id.* (Emphasis Added)

⁸ Pages 48-49; CAISO Draft 20-Year Transmission Outlook

PTEP can play a pivotal role in the delivery of Central Valley solar to the LA Basin. The CAISO's April 3rd Draft Report (at 14-15) does not currently approve PTEP but states (at 14-15) that:

The ISO will also continue to explore gas-fired generation retirement plans with the CPUC and work with LADWP on potential collaboration opportunities regarding the Pacific Transmission Expansion Project both leading up to presenting this Plan to the ISO Governors for approval, and after the Plan has been approved.

At the May 18, 2023 CAISO Board Meeting, regarding the 2022-23 Transmission Plan, the CAISO clarified that a recommendation to approve PTEP as part of this planning cycle may be made at a later time. CEERT representatives then once again urged CAISO to approve a joint PTEP/LADWP line into LA which is important to the environmental community including Equal Justice advocates. Therefore, we request that the Commission urge CAISO to approve the PTEP Project in this 2022-23 TPP cycle and avoid the potential extended delay for Central Valley solar to be able to access the LA Basin. The need for this access is clear and undeniable and any unnecessary delay in implementing a solution cannot be justified. This is particularly true because, as we explained in our April 25 comments to the CAISO on the April 3rd Draft Plan, PTEP is a multi-purpose, least-regrets project that is a prudent choice for California under multiple scenarios.

PTEP also can mitigate the harmful effects of delays associated with land-based transmission solutions presently being considered.

California Western would greatly appreciate any support for PTEP that the Commission can provide.

Respectfully submitted,

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