

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop  
an Electricity Integrated Resource Planning  
Framework and to Coordinate and Refine  
Long-Term Procurement Planning  
Requirements.

R.16-02-007

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
COMMENTS ON PROPOSED DECISION ON  
2019-2020 ELECTRIC RESOURCE PORTFOLIOS TO INFORM  
INTEGRATED RESOURCE PLANS AND TRANSMISSION PLANNING**

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## TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY .....	1
II.	THE PD’S DIRECTIVES REGARDING SUBMISSION OF CONFORMING PORTFOLIOS SHOULD BE CLARIFIED .....	2
III.	THE PD’S ALLOCATION OF CHP EMISSIONS SHOULD BE CLARIFIED.....	3
IV.	THE PD’S CHARACTERIZATION OF CALCCA’S POSITION ON IMPORT RA CONSTRAINTS SHOULD BE CORRECTED .....	5
V.	THE CAISO 2020-2021 TRANSMISSION PLANNING PROCESS SHOULD BE BASED ON THE 2019-2020 REFERENCE SYSTEM PORTFOLIO.....	6
	A. The RSP Should be Updated to Enable Alignment of the CAISO Transmission Plan with the 2019-2020 RSP LSE IRP Portfolios .....	6
	B. The Commission Should Coordinate with the CAISO in Mapping Generic Storage to Specific Locations for the Sensitivity Portfolios included in the 2019-2020 RSP .....	7
VI.	THE INTERACTION OF THE IRP PROCESS AND THE COMMISSION’S MICROGRID PROCEEDING SHOULD BE ADDRESSED .....	8
	A. The Commission Should Grant the Joint PfM or, at a Minimum, Clarify the Scope of Acceptable Projects for All LSEs .....	9
	B. The Commission Should Require Resources Eligible for Procurement Track Counting to Conform to the Loading Order and to be Supported by a Least-Cost Best-Fit Analysis.....	11
	C. The Commission Should Consider Procurement Proposals Through an Application Process If the Objective of the Procurement Expands Beyond System Reliability Procurement. ....	12
	D. Cost Allocation for Resources Overlapping Procurement and Microgrid Purposes Must Be Clear.....	13
VII.	CONCLUSION.....	14
	APPENDIX A.....	A-1

**TABLE OF AUTHORITIES**

	<b>Page</b>
<b>CPUC Commission Orders and Decisions</b>	
D.19-11-016 .....	9
R.16-02-007, <i>Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements</i> .....	11
R.18-07-003, <i>Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2019 Renewables Portfolio Standard Procurement Plans</i> .....	11
 <b>Miscellaneous</b>	
Reliability Assessment Unified Planning Assumptions & Study Plan, 2020-2021 Transmission Planning Process Stakeholder Meeting, February 28, 2019.....	7
Policy-driven Assessment Unified Planning Assumptions & Study Plan, 2020-2021 Transmission Planning Process Stakeholder Meeting, February 28, 2019.....	8

## **SUBJECT INDEX OF RECOMMENDATIONS**

CalCCA generally supports adoption of the proposed decision, modified as follows to:

- ✓ Clarify that LSEs must present a Conforming Portfolio for aggregation purposes but may also provide Alternative Portfolios to inform ongoing refinement and improvement to Integrated Resource Plan (“IRP”) assumptions and processes.
- ✓ Acknowledge that the PD’s allocation of exports from combined heat and power (“CHP”) resources among LSEs is an interim solution, and limit any such allocation to the amount of CHP not otherwise shown directly in an LSE’s individual plan;
- ✓ Correct the PD’s characterization of CalCCA’s position on import RA constraints; CalCCA proposed using a declining trendline rather than a static 11 GW constraint; and
- ✓ Prohibit reliance on new-build natural gas resources to meet procurement track requirements or, at a minimum, clarify the scope of projects that would be eligible for compliance.

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The California Community Choice Association<sup>1</sup> (CalCCA) submits these comments on Administrative Law Judge Fitch’s proposed decision addressing 2019-2020 Electric Resource Portfolios to Inform Integrated Resource Plans and Transmission Planning (“PD”) issued on February 21, 2020.

**I. INTRODUCTION AND SUMMARY**

CalCCA appreciates the opportunity to provide comments on the PD’s proposed Reference System Plan (“RSP”), which will inform individual load-serving entity (“LSE”) integrated resource plans but will not be used by the California Independent System Operator (“CAISO”) for purposes of transmission planning. CalCCA generally supports adoption of the PD, modified as follows to:

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<sup>1</sup> California Community Choice Association represents the interests of 19 community choice electricity providers in California: Apple Valley Choice Energy, Clean Power SF, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, San Jose Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, and Valley Clean Energy.

- ✓ Clarify that LSEs must present a Conforming Portfolio for aggregation purposes but may also provide Alternative Portfolios to inform ongoing refinement and improvement to Integrated Resource Plan (“IRP”) assumptions and processes.
- ✓ Acknowledge that the PD’s allocation of exports from combined heat and power (“CHP”) resources among LSEs is an interim solution, and limit any such allocation to the amount of CHP not otherwise shown directly in an LSE’s individual plan;
- ✓ Correct the PD’s characterization of CalCCA’s position on import RA constraints; CalCCA proposed using a declining trendline rather than a static 11 GW constraint; and
- ✓ Prohibit reliance on new-build natural gas resources to meet procurement track requirements or, at a minimum, clarify the scope of projects that would be eligible for compliance.

Appendix A presents proposed changes to the PD’s text, Findings of Fact, and Conclusions of Law.

## **II. THE PD’S DIRECTIVES REGARDING SUBMISSION OF CONFORMING PORTFOLIOS SHOULD BE CLARIFIED**

The PD requires all LSEs to file both Standard Portfolios and Conforming Portfolios that adhere to the assumptions used to form the 2019-2020 RSP.<sup>2</sup> The PD eliminates the Alternative Portfolio on grounds that submission of alternatives in the 2017-2018 IRP cycle made aggregation challenging.<sup>3</sup> While CalCCA does not oppose the PD’s conclusion or reasoning, the Commission should clarify the PD to require Conforming Portfolios *for the purpose of aggregation*, but permitting the presentation of Alternative Portfolios to inform development of the Preferred Resource Plan (“Plan”) and future RSP modeling.

LSEs may find in the development of their Conforming Portfolios that the underlying assumptions do not adequately represent the LSE’s circumstances. For example, an LSE may adopt a lower greenhouse gas (“GHG”) benchmark for the load it serves, increase assumptions

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<sup>2</sup> PD, Ordering Paragraph 5 at 80-81.

<sup>3</sup> *Id.*

regarding electric vehicle adoption, specify alternative Renewable Portfolio Standard (“RPS”) constraints, or rely on different cost assumptions in response to solicitation results. In addition, some CCAs are pursuing additional sensitivity analyses that may show strong impacts from departures from RSP assumptions (e.g., slower solar and storage cost declines or differences in gas price projections). Alternative Portfolios and sensitivity analyses that are presented by LSEs can help inform the adoption of a Preferred System Portfolio that accommodates variations in inputs and assumptions and is informed by actual procurement activity. This insight is particularly valuable given the proposed 2019-20 RSP had a limited number of sensitivities performed around the final set of input assumptions. It would be counterproductive to prohibit the presentation of these alternative views to Staff to inform ongoing refinements and improvements in Integrated Resource Planning (“IRP”) assumptions and processes. Particularly given how quickly the energy market can change, the Commission should not foreclose the submission of new, relevant information to help guide a process that will result in real procurement decisions.

### **III. THE PD’S ALLOCATION OF CHP EMISSIONS SHOULD BE CLARIFIED**

The PD proposes to allocate CHP resource emissions among LSEs, distinguishing between “in front of the meter” (“IFM”) and “behind the meter” (“BTM”) resources. While this approach may be reasonable as an interim, simplifying approach, the Commission should ensure emissions are not being misallocated or double counted.

The PD explains its CHP allocation proposal as follows:

[E]missions from all non-dispatchable in-front-of-the-meter CHP within the CAISO is automatically allocated to each LSE according to its load share, and BTM CHP emissions will be added

to the system total by Commission staff during the portfolio aggregation process.<sup>4</sup>

The PD's load-share allocation of these emissions is a result of two key assumptions: (a) the full retention of all supply-side, non-dispatchable CHP resources through the modeling horizon due to the presence of a thermal host and (b) a desire to assign these emissions to a specific LSE rather than to system power or alternately to the system total (as BTM CHP is treated).

As an initial matter, the PD does not expressly distinguish IFM from BTM CHP resources. Presumably, IFM CHP includes the export power portion of a CHP resource (which is by its very nature is BTM), while the BTM CHP includes the power produced and used by a host customer behind its utility meter. The PD should confirm its definition of these two types of CHP.

Assuming this characterization correctly reflects the PD's intent, the PD's approach is a reasonable simplification for IFM CHP, but *only* on an interim basis. The PD concludes that CHP resources are "necessary to meet existing reliability ... requirements in perpetuity."<sup>5</sup> However, according to some stakeholders, some of these resources currently lack a contractual path for retention and therefore cannot be attributed to specific LSEs. Presumably, the PD refers to IFM CHP, since only this portion of CHP output is delivered by the grid. If the PD is correct that the IFM CHP is needed, then it is also correct that one or more of the LSEs submitting plans will ultimately procure these resources (or they will be subject to the CAISO's Capacity Procurement Mechanism ("CPM")). It is not clear, however, whether the PD also refers to BTM CHP.

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<sup>4</sup> PD at 55.

<sup>5</sup> *Id.* at 36.

Without any further information on which LSE will procure the resource, a pro rata allocation of IFM CHP is a reasonable interim simplification. But any IFM CHP that *has already been procured* by an individual LSE should be included in the IRP plan of that LSE and deducted from the total allocated to other LSEs to ensure those emissions are being correctly attributed and not double counted.

Segregating BTM CHP emissions from an individual LSE's portfolios will support appropriate emissions accounting and decarbonization planning in several ways. First, it will clearly identify the emissions for which individual LSEs have responsibility and agency. In contrast to the IFM CHP, none of the LSEs presenting IRP plans will be procuring the BTM CHP nor will they be serving the BTM customer load. Second, it clearly identifies emissions attributable to industrial customer BTM combustion. Reducing emissions from these customers will require strategies and policies distinct from those used to address emissions from utility-scale resources, and establishing clear attribution and metrics will facilitate future policymaker intervention within the IRP and other policy venues.

#### **IV. THE PD'S CHARACTERIZATION OF CALCCA'S POSITION ON IMPORT RA CONSTRAINTS SHOULD BE CORRECTED**

The PD mischaracterizes CalCCA's position regarding modeling import RA constraints. The PD erroneously states that CalCCA supported the use of an 11 GW import constraint.<sup>6</sup> CalCCA recommended that, preferably, the Commission rely on a constraint trend based on a quantitative understanding of trends and events throughout the Western region, such as the timing of specific RPS requirements or the timing and magnitude of specific retirements. At a minimum, CalCCA supported a trendline approach, which is more likely to reflect the gradual tightening of the import RA market than an immediate unsubstantiated constraint. Observing

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<sup>6</sup> PD at 27.

market data points on import capability ranging from 6,000 MW to 11,000 MW, CalCCA concluded:

Thus, while Staff has reasonable grounds for its caution regarding import reliance, import availability should be studied more closely to assess the pace of anticipated decline before resorting to the blunt instrument of a 5,000 MW constraint for all study years. Until a study can be completed, the Commission should modify import availability sensitivities to utilize an import constraint trendline rather than a static value.<sup>7</sup>

While it is too late in this IRP cycle to develop a trendline, CalCCA requests that the Commission correct the PD's characterization of CalCCA's position on import RA modeling constraints and supports the use of more granular, data-driven import assumptions in future cycles.

**V. THE CAISO 2020-2021 TRANSMISSION PLANNING PROCESS SHOULD BE BASED ON THE 2019-2020 REFERENCE SYSTEM PORTFOLIO**

**A. The RSP Should be Updated to Enable Alignment of the CAISO Transmission Plan with the 2019-2020 RSP LSE IRP Portfolios**

The PD adopts the updated 2017-2018 Preferred System Plan ("2017 PSP") as the reliability and policy-driven base case, while offering the 2019-2020 Reference System Plan adopted in this decision as a policy-driven sensitivity case.<sup>8</sup> Jurisdictional LSEs are required to have portfolios in their individual IRPs that conform to the 2019 RSP, even though it would be considered only as a policy-driven sensitivity in the CAISO 2020-2021 Transmission Planning Process ("TPP"). This means that both the individual LSE IRP portfolios and their aggregation will not align with the CAISO 2020-2021 transmission plan.

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<sup>7</sup> *California Community Choice Association Comments on Administrative Law Judge's Ruling Seeking Comment on Proposed Reference System Portfolio and Related Policy Action*, December 17, 2019, at 20.

<sup>8</sup> PD at 4.

This mismatch means the transmission plan to be approved by the CAISO Board of Governors will not include potential transmission upgrades needed to support the resources included in the 2019 RSP. Instead, transmission plan will be more or less consistent with the older 2017-2018 PSP that the Proposed Decision directs be forwarded to the CAISO. As a result, to the extent jurisdictional LSEs are pursuing generating projects consistent with the 2019-2020 RSP, some of those projects might not have the necessary transmission to deliver power.

CalCCA recognizes the delay in providing the RSP to the CAISO for TPP purposes and the complexity of mapping generic storage, as discussed below. These delays and complexities, however, do not justify reliance on a stale and outdated PSP. The Commission, instead, should quickly make adjustments to the 2019-2020 RSP necessary to accommodate the CAISO's reliance for purposes of the TPP. The Commission likewise should take the steps needed to ensure that a similar problem does not arise in the 2021-2022 IRP process.

**B. The Commission Should Coordinate with the CAISO in Mapping Generic Storage to Specific Locations for the Sensitivity Portfolios included in the 2019-2020 RSP**

The 2017-2018 PSP, which was provided as the base portfolio to the CAISO in the 2019-2020 TPP, included more than 2,000 MW of energy storage that was not mapped to specific locations, so the CAISO did not model them. Although the PD is silent about the modeling of these storage resources in the 2020-2021 TPP base portfolio, we understand that the CAISO intends to consider these resources as potential mitigation options for reliability needs identified in the 2020-2021 TPP because LSEs are expected to procure a significant amount of storage.<sup>9</sup>

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<sup>9</sup> Reliability Assessment Unified Planning Assumptions & Study Plan, 2020-2021 Transmission Planning Process Stakeholder Meeting, February 28, 2019, p. 19.

CalCCA supports using energy storage as a mitigation measure without including the full capital cost as reflected in the Commission-provided base portfolio. Since the LSEs are expected to bear the cost of such procurement, when storage is considered as a candidate reliability mitigation option, it is reasonable not to consider its full capital cost while comparing it with other mitigation alternatives. CalCCA recommends, however, that the CAISO include the incremental costs<sup>10</sup> associated with the candidate energy storage options.

The PD indicates Commission staff will provide a full description of the methodology used to map storage to busbars in the updated version of the busbar mapping methodology to be released in March 2020.<sup>11</sup> CalCCA strongly supports the coordination between the CPUC staff and the CAISO in mapping generic storage to specific locations for the sensitivity portfolios included in the 2019-2020 RSP. This mapping will identify a much more significant amount of storage resources that are likely to have important impacts on the transmission system.<sup>12</sup>

## **VI. THE INTERACTION OF THE IRP PROCESS AND THE COMMISSION'S MICROGRID PROCEEDING SHOULD BE ADDRESSED**

The PD implicitly raises issues related to the interaction of the IRP process with the Commission's ongoing microgrid proceeding, R.19-09-009. The PD, in rejecting the Petition for Modification filed by the California Environmental Justice Alliance, Sierra Club, Defenders of Wildlife, and CalAdvocates ("Joint PFM") to limit reliance on new fossil-fueled resources, cites the Commission's desire not to preclude "potentially desirable projects" that may rely on biomethane.<sup>13</sup> Presumably, this refers to proposals by Pacific Gas and Electric Company in

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<sup>10</sup> One example of the incremental cost is the additional cost incurred for siting the storage in a particular local area versus locating it elsewhere.

<sup>11</sup> PD at 63.

<sup>12</sup> Policy-driven Assessment Unified Planning Assumptions & Study Plan, 2020-2021 Transmission Planning Process Stakeholder Meeting, February 28, 2019, at 16-17.

<sup>13</sup> PD at 69.

R.19-09-009 to undertake distributed generation-enabled microgrid services (“DGEMS”) at substations, which may rely on biomethane.<sup>14</sup>

CalCCA agrees that there is a connection between the IRP process, particularly the Procurement Track, and the microgrid proceeding. The PD should be modified to address this connection in two respects. First, the Commission should prohibit reliance on new-build fossil resources for Procurement Track eligibility or, at a minimum, clarify the scope of acceptable projects so all LSEs are on equal footing. Second, the Commission should make clear that an IOU may not bypass the loading order or least-cost best-fit (“LCBF”) justification for purposes of the IRP simply because a project is procured as a result of a plan adopted in the microgrid proceeding. Any proposed procurement of generation made to provide safe, reliable service in lieu of functioning transmission and distribution infrastructure should be compared not only with competing bids for generation, but with the costs to repair the grid.

**A. The Commission Should Grant the Joint PfM or, at a Minimum, Clarify the Scope of Acceptable Projects for All LSEs**

The PD addresses the Joint PfM arising from the procurement track decision, D.19-11-016. While prohibiting “new natural-gas-only resources on new sites” to meet procurement requirements, the PD left loopholes for fossil-fueled projects: “new projects that may utilize storage combined with some natural gas may be desirable,”<sup>15</sup> and “some augmentation of capacity, at existing sites and including efficiency improvements or repowering, may also help support system reliability.” The Joint PfM requests clarification that “the only projects that

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<sup>14</sup> See Biomethane Request for Offers in Support of the 2019 System Reliability RFO Distributed Generation Enabled Microgrid Services (“DGEMS”) Phase Solicitation Protocol [https://www.pge.com/pge\\_global/common/pdfs/for-our-business-partners/energy-supply/electric-fuels/rfo/Biomethane-RFO-Solicitation-Protocol.pdf](https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-supply/electric-fuels/rfo/Biomethane-RFO-Solicitation-Protocol.pdf).

<sup>15</sup> D.19-11-016 at 65.

utilize fossil fuel that may be allowed include the following narrow set of options: (1) energy storage projects that decrease GHG emissions and (2) projects that increase the efficiency or capability of existing units.”<sup>16</sup>

The PD denies the PFM, in part to avoid prohibiting “potentially desirable projects such as compressed air energy storage or resiliency projects at substations utilizing biomethane.”<sup>17</sup>

CalCCA is concerned that the PD, reinforcing D.19-11-016, may lead to the development of new fossil-fueled projects to meet the Procurement Track requirements. Unless a project has enforceable provisions that it will solely use renewable natural gas as a feedstock, such projects should be assumed to be fossil-fuel resources and not counted toward procurement track resources.

An unambiguous modification of D.19-11-016, as proposed in the Joint PFM to close this loophole, would more effectively support California’s climate goals. The PD takes comfort, however, in the Commission’s approval process:

Fortunately, the provisions of D.19-11-016 still require Commission consideration and approval of all the projects used by the investor-owned utilities to satisfy their obligations under the decision. Thus, if the Commission or other parties see significant problems with the procurement choices of the investor-owned utilities (IOUs), the Commission has the option not to approve those contracts for cost recovery.<sup>18</sup>

It further suggests that for CCAs and ESPs, “the language in the decision...serves as policy guidance.”<sup>19</sup> Unfortunately, the “language in the decision” lacks clarity, leaving ambiguity for CCAs and ESPs whose contracts are not approved by the Commission.

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<sup>16</sup> PD at 66 (quoting Joint PFM at 16).

<sup>17</sup> *Id.* at 69.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* at 69-70.

The Commission should grant the PFM. If the Commission denies the PFM, it must clarify the boundaries of the loophole for *all* LSEs. If the Commission rejects the Joint PFM clarifications, the Commission must more clearly articulate the types of projects it will deem acceptable for procurement track compliance to place all LSEs on a level playing field.

**B. The Commission Should Require Resources Eligible for Procurement Track Counting to Conform to the Loading Order and to be Supported by a Least-Cost Best-Fit Analysis**

An IOU's procurement activities are driven by the need to conform to the Commission's loading order,<sup>20</sup> which mandates that the IOU first consider energy efficiency and demand response to meet its needs, followed by renewable alternatives and, lastly, clean fossil generation. The IOU is also bound to perform a LCBF analysis to support its renewable procurement.<sup>21</sup>

The resources solicited in PG&E's "2019 System Reliability Request for Offers - Distributed Generation Enabled Microgrid Services (DGEMS) Phase" ("PG&E RFO") should not be counted toward an IOU's Procurement Track requirement *unless* PG&E's selection meets the loading order and is supported by a LCBF analysis.<sup>22</sup> In addition, for purposes of DGEMS projects, the Commission should consider modifying the LCBF analysis. When evaluating generation resources that serve as a replacement for transmission or distribution ("T&D") upgrades or provide reliability in areas where the T&D is unsafe to operate, IOUs seeking

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<sup>20</sup> See, e.g., R.16-02-007, *Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements*, February 11, 2016, at 5.

<sup>21</sup> See, e.g., R.18-07-003, *Assigned Commissioner and Assigned Administrative Law Judge's Ruling Identifying Issues and Schedule of Review for 2019 Renewables Portfolio Standard Procurement Plans*, April 19, 2019, at 17.

<sup>22</sup> CalCCA observes that the Evaluation Criteria identified in Section III of PG&E's Biomethane RFO did not include these requirements. [https://www.pge.com/pge\\_global/common/pdfs/for-our-business-partners/energy-supply/electric-fuels/rfo/Biomethane-RFO-Solicitation-Protocol.pdf](https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-supply/electric-fuels/rfo/Biomethane-RFO-Solicitation-Protocol.pdf).

procurement credit for the resources must demonstrate that certain criteria are met. The generation resources they select must not only be the best among generator bids; they must also be a better lifecycle investment than grid hardening.

**C. The Commission Should Consider Procurement Proposals Through an Application Process If the Objective of the Procurement Expands Beyond System Reliability Procurement**

As noted above, the PD rejects the Joint PFM in large part based on grounds that the approval process of IOU procurement contracts will enable the Commission and stakeholders to address the impacts of fossil-fueled resources.<sup>23</sup> However, allowing the IOUs to submit this mandated procurement for approval through an advice letter process instead of an application shortens the review period to such an extent that adequate review may not be possible. As the Joint PFM points out, the Tier 3 advice letter procedure does not allow for evidentiary hearings, establishing a discovery record, or other processes inherent in an application.

CalCCA agrees with the Joint Parties. While the Tier 3 Advice Letter process may be appropriate to approve mandated procurement per D.19-11-016, it is not the appropriate venue to approve PG&E's RFO results. By proposing that mandated procurement under the IRP proceeding should also meet resiliency needs, PG&E is attempting to fit a square peg (long-term, cost-effective and reliable generation resources) into a round hole (the urgent, flexible, and short-term need for generation for resiliency purposes).

The PD also errs in concluding that "PG&E's resiliency proposals should and will be litigated in other proceedings." Only portions of PG&E's permanent generation DGEMS proposal will be litigated in R.19-09-009, *i.e.* the upgrades necessary for substations to

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<sup>23</sup> PD at 69.

accommodate generation (*i.e.* the “Make Ready Program”); the actual generation resources are being solicited under IRP.

There will likely be numerous factual issues arising from PG&E’s eventual proposals to the Commission. For example, mitigation responses to PSPS events must first be addressed with wire solutions, such as line hardening and sectionalization. This work, which is being implemented by PG&E over the next 10 years, will necessarily change the need for generation solutions for resiliency purposes. Therefore, any generation installed for resiliency purposes must (1) be temporary in nature and (2) must be able to adapt to changing needs for generation based on wire upgrades, changes in load at the substation, and changing wind and weather patterns. A Tier 3 advice letter is not the appropriate venue for a first-of-its-kind resiliency proposal with questionable cost-effectiveness that also includes significant greenhouse gas emissions impacts on local communities. The Commission should direct that a single proceeding address the full cost, ratepayer impacts, factual issues, and resiliency aspects of the permanent generation DGEMS proposal.

In addition, through the PG&E RFO, PG&E expands the scope, costs, and strategic impacts of the mandated procurement order. PG&E is *de facto* developing a full resiliency strategy with expansive cost, emissions, and precedent-setting impacts. This type of procurement strategy goes far beyond what was originally envisioned by the Commission when allowing mandated procurement under the IRP to be approved by a Tier 3 Advice Letter. Therefore, the appropriate venue for stakeholder review in this instance is an Application.

**D. Cost Allocation for Resources Overlapping Procurement and Microgrid Purposes Must Be Clear**

Projects that an IOU claims to serve two purposes – meeting system reliability requirements and providing resiliency – create ambiguity in cost responsibility. CalCCA

submits that if an IOU seeks Procurement Track eligibility for a dual-purpose project, cost recovery should remain with bundled customers.

## **VII. CONCLUSION**

CalCCA appreciates this opportunity to provide input on the PD and supports adoption of the PD subject to the recommendations presented in these comments.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl".

Evelyn Kahl  
General Counsel to the  
California Community Choice Association

March 12, 2020

## APPENDIX A

### Proposed Changes

#### Corrections to Text at page 27

On the import assumptions, parties had mixed opinions on whether to use 5 GW as the import limit (CAC, AWEA, and CalWEA supported this level), the MIC level of 11 GW (UCS, Cal Advocates, ~~CalCCA~~, and POC supported this level), or something else (Powerex supported a 3 GW import limit). CalCCA recommends using a constraint trend based on a quantitative understanding of trends and events throughout the Western region, such as the timing of specific RPS requirements or the timing and magnitude of specific retirements or, at a minimum, a declining trendline.

#### Findings of Fact

24. ~~There is too much~~ While there is geographical uncertainty associated with the capacity identified in the 2019-2020 RSP adopted in this decision, particularly with respect to battery storage, using to use the 2019-2020 RSP as the reliability and policy-driven base case for the CAISO TPP this year would better align transmission planning with the direction of procurement.

25. ~~Several updates and improvements to the 2017-2018 PSP are reasonable~~ Refinement of the 2019-2020 RSP is needed, include mapping storage resources, if it continues to be utilized for CAISO TPP purposes, including updates to the baseline resources, updates to the locations of some generation delivering to particular substations, and updates based on commercial interest in the CAISO interconnection queue.

## Conclusions of Law

New. LSEs may submit, in addition to Conforming Portfolios, Alternative Portfolios to inform the development of the PSP and potential updates to the IRP process for the next cycle.

22. The Commission should utilize the 2019-2020 RSP ~~2017-2018 PSP~~ as the reliability and policy-driven base case, with updates as described in this decision, to forward to the CAISO for purposes of its 2020-21 TPP.

23. ~~The Commission should forward the 2019-2020 RSP adopted in this decision to the CAISO as a policy driven sensitivity for its 2020-21 TPP.~~

29. The December 11, 2019 PFM of CEJA, Sierra Club, DOW, and Cal Advocates of D.19-11-016 is granted ~~should be denied~~.

## Ordering Paragraphs

8. For purposes of the California Independent System Operator's Transmission Planning Process for 2020-21, the Commission requests that the CAISO rely on the ~~requests the following scenarios be studied, and forwarded by Commission staff with detailed busbar mapping to the extent possible: (a) The 2017-2018 Preferred System Portfolio adopted in Decision 19-04-040, with updates to the baseline and some generation locations as detailed in this decision, as the reliability base case and the policy driven base case. (b) The 2019-2020 Reference System Portfolio adopted in this decision as a policy driven sensitivity.~~

10. The December 11, 2019 Petition for Modification of Decision 19-11-016 of the California Environmental Justice Alliance, Sierra Club, Defenders of Wildlife, and the Public Advocates' Office is granted ~~denied~~.

11. The interaction of the IRP procurement track and any DGEMS proposals must be addressed in a separate track, including cost allocation and IPR procurement track eligibility for DGEMS driven resources.