



Submit comment on July 27 stakeholder call discussion

2021-2022 Transmission planning process

1. Provide a summary of your organization's comments on the July 27, 2021 stakeholder call discussion:

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the presentations from the July 27, 2021 stakeholder call. Forward planning and coordination between the CAISO, California Public Utilities Commission (Commission), and the California Energy Commission (CEC) will play a critical role in ensuring California can meet its ambitious climate goals reliably and cost effectively. Transmission planning is a major piece of this coordination, and the CAISO must approve transmission projects far enough in advance to accommodate the influx of clean resources that will come online to meet Senate Bille (SB) 100 targets. The 20-year Transmission Outlook should inform transmission planning that results in approval of projects far enough in advance to reliably meet climate goals.

2. Provide your organization's comments on the transmission capability information provided to the California Public Utilities Commission through its Integrated Resource Planning Process, as described in slides 4-28:

CalCCA supports the CAISO's efforts updating the transmission capability estimates used in the Integrated Resource Planning (IRP) Process and appreciates the collaborative effort between the CAISO and the Commission. Coordination between the CAISO and the Commission is crucial to ensure transmission and resource build can reliably meet climate goals.

3. Provide your organization's comments on the Policy-driven Assessment Sensitivity 1 – Offshore Wind Studies topic, as described in slides 29-50 related to the 2021-2022 Transmission Planning Process:

No comments at this time.

4. Provide your organization's comments on the Economic Assessment Assumption Update for 2021-2022 Planning Cycle topic, as described in slides 51-65 related to the 2021-2022 Transmission Planning Process:

The CAISO's presentation indicates their model will assume co-located storage resources can charge from the grid, noting this will result in a loss of investment tax credit dollars for the resource owner. The CAISO should reconsider whether this assumption appropriately reflects how storage resources will operate given the significant cost impact grid charging has on resource owners eligible for the investment tax credit.

5. Provide your organization's comments on the Out of State Wind In Portfolios topic, as described in slides 66-73 related to the 2021-2022 Transmission Planning Process:

CalCCA is encouraged that the CAISO plans to perform a special study on out-of-state wind transmission alternatives. The CAISO, Commission, and CEC should consider these out-of-state transmission projects in the context of both IRP and Transmission Planning Process (TPP) processes to understand how each project enhances California's ability to access clean and renewable resources in the most cost effective and reliable way to meet SB 100 goals. In particular,

resource profiles for out-of-state wind appear attractive when looking at potential resource output during critical hours but the CAISO, the Commission, and the CEC should also consider IRP cost assumptions and individual load-serving entities IRP reporting to determine whether or not such resources are selected in IRP modeling.

Any such consideration of out-of-state wind, or other out-of-state resources should be evaluated with cost effectiveness in mind. The results of the TPP should not simply find resources that are attractive but will never be built and imported due to cost constraints while building transmission in anticipation of such resources. Modeling of the need and the costs of alternatives will therefore play a critical role in this process.

6. Provide your organization's comments on the updates related to the 20-Year Transmission Outlook, as described in slides 74-84:

CalCCA appreciates the CAISO's efforts to develop the 20-year Transmission Outlook and commends the CAISO for its collaboration with the Commission and the CEC in the IRP, SB 100, and Integrated Energy Policy Report (IEPR) processes. Coordination with these processes will ensure resource procurement and new transmission build aligns. Forward planning with a long enough lead time will be critical in ensuring the state is prepared to meet SB 100 goals that require renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers by 2045. The CAISO should consider how the 20-year Transmission Outlook could be incorporated into the existing Transmission Planning Process (TPP) to consider what transmission build will need to occur and in what timeframe to meet policy goals. Given the time required develop new transmission, the 10-year look ahead in the TPP can result in transmission projects coming online just in time to meet an identified reliability need.

CalCCA is encouraged that the 20-year Transmission Outlook will utilize the SB 100 "No Combustion" scenario for 2040. Recognizing that decarbonization goals necessitate significant resource build, it is prudent to use this scenario to inform potential transmission projects so that new clean resources do not get stranded behind transmission constraints. Considering the large number of resources expected to come online to meet state policies, the TPP could benefit from the insight of a longer planning horizon provided by the 20-year Transmission Outlook to inform policy-driven transmission projects. The 20-year Transmission Outlook should be used to inform the TPP of transmission needs driven by clean energy policies like SB 100 so that projects approved in the TPP also contribute to meeting policy goals that will be realized beyond 10 years out.

CalCCA also supports the 20-year Transmission Outlook's consideration of key environmental and land use impacts provided by the CEC. Land use and habitat concerns can create serious delays or project cancellations if not incorporated into site evaluation from the start. By incorporating these considerations into transmission planning, the CAISO, the Commission, and the CEC can help steer projects to less sensitive areas and avoid potentially serious delays or cancellations of transmission projects needed to integrate future resource procurement.

7. Additional comments on the July 27, 2021 stakeholder call discussion:

No additional comments at this time.