



## **Submit comment on September 27-28 Stakeholder Call Discussion**

2021-2022 Transmission planning process

**1. Provide your organization's comments on the overview and key issues, as described in slides 4-16 of the ISO's day 1 presentation:**

No comments at this time.

**2. Provide your organization's comments on the preliminary reliability assessment results for the northern areas, as described in slides 17-118 of the ISO's day 1 presentation:**

No comments at this time.

**3. Provide your organization's comments on the high voltage assessment results for the PG&E area, as described in slides 119-143 of the ISO's day 1 presentation:**

No comments at this time.

**4. Provide your organization's comments on the preliminary reliability assessment results for the southern areas, as described in slides 144-220 of the ISO's day 1 presentation:**

No comments at this time.

**5. Provide your organization's comments on the preliminary reliability assessment results for the VEA areas, as described in slides 221-232 of the ISO's day 1 presentation:**

No comments at this time.

**6. Provide your organization's comments on the preliminary reliability assessment results for the SDG&E areas, as described in slides 233-253 of the ISO's day 1 presentation:**

No comments at this time.

**7. Provide your organization's comments on the wildfire assessment scenarios, as described in slides 254-261 of the ISO's day 1 presentation:**

No comments at this time.

**8. Provide your organization's comments on the updates related to the 20-Year Transmission Outlook, as described in slides 262-281 of the ISO's day 1 presentation:**

CalCCA reiterates its appreciation from previous comments on the CAISO's efforts to develop the 20-year Transmission Outlook and commends the CAISO for its collaboration with the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) in the IRP, SB 100, and Integrated Energy Policy Report (IEPR) processes.<sup>1</sup> 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 to 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 Starting Point scenario based off the SB 100 Core 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. It may be valuable for the CAISO and the CEC to incorporate such impacts to the normal TPP cycle as well. 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.

**9. Provide your organization's comments on the PG&E Reliability Alternatives:**

No comments at this time.

**10. Provide your organization's comments on the SCE Reliability Alternatives:**

No comments at this time.

**11. Provide your organization's comments on the SDG&E Reliability Alternatives:**

No comments at this time.

**12. Provide your organization's comments on the GLW Reliability Alternatives:**

No comments at this time.

**13. Provide your organization's comments on the economic assessment update, as described in slides 1-9 of the ISO's day 2 presentation:**

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<sup>1</sup> CalCCA Comments on July 27, 2021 Transmission Planning Stakeholder Call, August 10, 2021.

No comments at this time.

**14. Provide your organization's comments on increasing procurement and capacity in portfolios topic, as described in slides 10-14 of the ISO's day 2 presentation:**

CalCCA generally supports the CAISO's intention to consider additional upgrades beyond those identified in the analysis for this planning cycle but requests additional clarification on how such upgrades will be selected. The CAISO's presentation indicates that it intends to consider additional upgrades to reflect the increase in resource procurement and provide flexibility for resources not currently in the base portfolio.<sup>2</sup> Transmission and resource build are inextricably linked and identifying additional upgrades now in anticipation of increased resource build could provide the necessary signals to resources as to where to site new resource build necessary to meet resource procurement targets and SB 100 goals. CalCCA looks forward to additional discussion on this topic in future stakeholder calls.

**15. Additional comments on the September 27-28, 2021 stakeholder call discussion:**

No comments at this time.

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<sup>2</sup> CAISO Day 2 Presentation at 12.