

# California Community Choice Association

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## Contact

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### 1. Comment on chapter 1 Introduction:

CalCCA has no comments at this time.

### 2. Comment on chapter 2 Reliability Assessment:

CalCCA has no comments at this time.

### 3. Comment on chapter 3 Policy-Driven RPS Transmission Plan Analysis:

#### Consideration of Long-Lead-Time Resources

The California Community Choice Association (CalCCA) is encouraged to see the 440 megawatts (MW) of geothermal in southern Nevada included in the Preferred System Plan (PSP) busbar mapping and the California Independent System Operator's (CAISO's) draft study plan. Significant additional potential for long lead time resources in the state of Nevada exists beyond what was included in the PSP, however. Such resources should be included in this cycle of the Transmission Planning Process (TPP) to allow for the development of significant amounts of cost-effective resources in line with the California Public Utilities Commission's (CPUC's) procurement requirements and to avoid stranded resource investments.

Within the Integrated Resource Plan (IRP) proceeding, CalCCA asked that the CPUC update the PSP Core Portfolio to plan for at least 2,000 MW of further incremental renewable resources imported from Nevada to allow the CAISO to study necessary import expansion in that region. The CPUC's Preferred System Plan Decision (D.22-02-004) stated that this request can be addressed in the next TPP portfolio.<sup>13</sup> It is critical for the CAISO to conduct this study in this TPP cycle as a sensitivity to reflect the availability and location of cost-effective resources (*i.e.*, "long-lead-time resources" that can fulfill the CPUC's Mid-term Reliability (MTR) requirements). Failure to do so could impact the ability for load-serving entities (LSEs) with out-of-state (OOS) RA contracts to receive Maxim Import Capability (MIC) in those areas because a study is needed for the CAISO to approve policy-driven projects associated with a MIC expansion request.

CalCCA also encourages the CAISO to complete a more comprehensive analysis of the location of expected near-term geothermal resources in Nevada as part of the TPP. The busbar mapping in the PSP Core Portfolio places 440 MW of geothermal resources at the Beatty substation in southern Nevada. However, CCAs are observing that many geothermal resources available in the near-term are located in northern or

western Nevada and not easily delivered at the Beatty substation or other southern Nevada transmission paths. Rather, they are relying on paths like Summit or Gonder IPP which have limited headroom for imports to CAISO. The TPP should evaluate cost-effective solutions for enabling transmission for these resources to the CAISO — some of which may reach commercial operations date (COD) as early as 2024. Long-term, the TPP should also evaluate how projects like Greenlink Nevada, the TransCanyon Cross-tie, and GridLiance West projects may improve the accessibility of geothermal power in Nevada.

### **Market Outreach on OOS Resource Potential**

In the 2021-2022 TPP cycle, the CAISO indicated it plans to conduct market outreach regarding market interest in OOS resources, specifically OOS wind in Idaho. The CAISO should broaden this outreach to gauge market interest for other OOS resources to inform transmission needed to deliver projects LSEs are pursuing.

### **Maximum Import Capability Improvements**

LSEs are increasingly finding opportunities to contract with resources outside of the CAISO Balancing Authority Area (BAA) in order to meet state climate objectives and procurement mandates. Given a significant risk in contracting with OOS resources is the ability to obtain MIC, the CAISO should provide additional transparency on how transmission upgrades identified in the TPP will affect MIC needed for LSEs to show resources out of state as resource adequacy (RA). Because LSEs must secure MIC at the right nodes to be able to use out-of-state resources like Nevada geothermal to provide RA capacity, they must be able to understand how projects in the transmission plan will affect import capability at specific nodes. The CAISO should provide data on deliverability or other technical limitations that would limit the ability for the CAISO to approve MIC expansions at specific branches. This transparency will minimize the risk of planned projects failing to materialize and minimize costs associated with the uncertainty around available MIC.

[\[1\]](#) *Decision Adopting 2021 Preferred System Plan (R.20-05-003)*, Feb. 10, 2022, at 173.

#### **4. Comment on chapter 4 Economic Planning Study:**

CalCCA has no comments at this time.

#### **5. Comment on chapter 5 Interregional Transmission Coordination:**

CalCCA has no comments at this time.

#### **6. Comment on chapter 6 Other Studies:**

CalCCA has no comments at this time.

**7. Please provide any additional comments:**

CalCCA has no comments at this time.