

California Community Choice Association

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Contact

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1. Please provide your organization's comments on the CPUC's higher levels of electrification for use in the 2022-2023 Transmission Planning Process (TPP):

On July 1, 2022, the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) submitted a joint Transmittal Letter to the California Independent System Operator Corporation (CAISO) for the 2022-2023 Transmission Planning Process (TPP) High Electrification (HE) Portfolio, in which the CPUC and CEC requested the CAISO update its 2022-2023 TPP Study Plan to:

1. Use the 2021 Integrated Energy Policy Report (IEPR) Additional Transportation Electrification scenario as its load assumptions for 2022-23 TPP base and sensitivity case studies;
2. Study the 30 million metric ton (MMT) HE policy-driven sensitivity portfolio transmitted as in the 2022-23 TPP HE Sensitivity Scenario; and
3. Continue studying the deliverability needs and corresponding transmission needs related to out-of-CAISO long-lead time resources, such as out-of-state wind and geothermal resources, beyond the CAISO's balancing area authority.^[1]

As described in the sections below, California Community Choice Association (CalCCA) supports each of these recommendations. As the state continues down the path of higher levels of electrification and renewable integration, it is critical the CAISO TPP inform the state of the new transmission infrastructure needed to achieve reliability and policy objectives.

[1] <http://www.caiso.com/InitiativeDocuments/2022-2023TransmissionPlanningProcess-PortfolioTransmittalLetter.pdf>.

2. Please provide your organization's comments on the CEC's development of higher electrification grid planning scenarios:

CalCCA supports use of the 2021 IEPR Additional Transportation Electrification scenario as the load forecast assumptions for the 2022-2023 TPP base and sensitivity case studies. Assuming HE and EV scenarios will better align the load forecast with the state's carbon-neutrality goals and goals that all in-state sales of new passenger cars and trucks will be zero-emission by 2035.^[1]

[1] Cal. Executive Order N-79-20.

3. Please provide your organization's comments on the CPUC's high electrification policy-driven sensitivity portfolio:

CalCCA supports use of the CPUC's HE policy-driven sensitivity portfolio in the CAISO's 2022-2023 TPP policy studies. In comments to the Preferred System Plan (PSP) in the CPUC's Integrated Resource Planning (IRP) proceeding (R.20-05-003), CalCCA recommended the CPUC commit to using the 30 MMT scenario in the next IRP process to continue the progression of lowering the GHG target in future years.[1] Including the CPUC's HE policy-driven sensitivity portfolio as a sensitivity study in the TPP will support this progression and allow for the necessary time to plan for a lower GHG target with HE.

This portfolio includes 600 additional megawatts (MW) of geothermal resources with the purpose of studying within the TPP, the transmission needs of interconnecting geothermal resources. CalCCA supports including additional geothermal in the sensitivity portfolio for study in the TPP, and has commented previously on geothermal resource potential in Northern Nevada that will be required to fulfill the CPUC's requirements for clean firm resources in the mid-term reliability procurement orders.[2] Studying additional geothermal resources in the TPP as soon as possible is crucial because these resources will require the CAISO to evaluate the potential need for expanding maximum import capability (MIC) and will likely require transmission upgrades.

[1] *California Community Choice Association's Comments on Administrative Law Judge's Ruling Seeking Comments on Proposed Preferred System Plan*, CPUC Rulemaking (R.) 21-05-003 (September 27, 2021) at 14.

[2] <https://stakeholdercenter.caiso.com/Comments/AllComments/f19a7845-cd76-4d0c-9ebf-041832dbbe23#org-93e17ef0-4df0-49b2-b29b-67f80a1459a4>.

4. Please provide you organization's comments on the CAISO's update to the 2022-2023 study plan assumptions:

CalCCA supports the CAISO's updates to the 2022-2023 final study plan assumptions, which incorporate the CEC's 2021 IEPR Additional Transportation Electrification scenario as the demand forecast and the CPUC's HE policy-driven sensitivity portfolio.

CalCCA also supports the CPUC and CEC's recommendation that the CAISO continue studying the deliverability needs and corresponding transmission needs related to long-lead time out-of-state resources, such as wind and geothermal. The ability to obtain MIC is a key contributor to load-serving entities' (LSEs') willingness to contract with an out-of-state resource because MIC is required for use of the resource as RA capacity. Therefore, CalCCA supports additional study of deliverability needs and corresponding transmission needs that will affect the ability of long-lead time resources to be used as 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 impact deliverability and available MIC at specific branches to minimize the risk of uncertainty around available MIC.

5. Please provide your organization's comments on the CAISO's study plan for the high electrification special/sensitivity study:

See response to #4.

6. Please provide your organization's comments on the CAISO's study plan for the reduced reliance on Aliso Canyon gas storage special study:

CalCCA has no comments at this time.

7. Please provide any additional comments that your organization has:

CalCCA has no comments at this time.