1. Please provide your organizations comments on adjusting the timeline for the release of the draft transmission plan from the end of January to the end of March, targeting approval in each year’s May Board of Governors meetings.

The California Community Choice Association (CalCCA) supports the California Independent System Operator’s (CAISO’s) proposal to extend phase two of the Transmission Planning Process (TPP) such that the draft transmission plan is posted in March and brought to the board in May. The detailed analysis and special studies provided in the draft TPP, which as the CAISO notes are becoming more voluminous and complex, are very valuable. CAISO staff should adjust the timeline of the TPP process in a manner that allows the CAISO to perform and document the studies in the same detailed manner as it has in past years.

2. Please provide your organizations comments on enabling approvals for major long lead time transmission projects needed beyond the current 10 year planning horizon.

CalCCA supports the CAISO enabling approvals for major long-lead-time transmission projects needed beyond the current 10-year planning horizon. The time it takes to complete major transmission projects, the increased demand projected under the CEC’s high electrification scenarios, and new resource build projected to come online to meet state policy goals may necessitate project approvals beyond the current 10-year horizon.

In the next straw proposal, the CAISO should provide additional detail on how the CAISO would prioritize project approvals whose need extends beyond the 10-year planning horizon. The way the CAISO ultimately prioritizes projects for approval beyond 10 years is a critical component of “least-regrets” planning given the significant cost impacts of transmission upgrades. The 20-year outlook estimated $30.5 billion worth of transmission development needed to integrate resources in the Senate Bill (SB) 100 Starting Point Scenario.[1] Careful prioritization is necessary such that long-lead-time transmission projects are approved and implemented in a manner that minimizes costs over the long term.


3. Please provide your organizations comments on retaining policy-driven transmission upgrade capacity for the specific policy purpose for which it was developed.
CalCCA supports the CAISO exploring the possibility of reserving policy-driven transmission capacity for the specific policy purpose for which it was developed. Reserving transmission capacity allocations to projects in the interconnection queue that would meet the resource portfolio from the Integrated Resource Plan (IRP) portfolios studied within the TPP would help better align the IRP, TPP, and interconnection processes. The CAISO should explore this approach further, and provide additional detail in the straw proposal regarding how the steps for allocating transmission capacity would change to incorporate the consideration of policy-driven upgrades.

4. Please provide additional comments your organizations has on the transmission planning process enhancements initiative.

CalCCA has no additional comments at this time.