

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

R.20-05-003

**FILED**

11/10/22

09:38 AM

R2005003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING  
COMMENTS ON ELECTRICITY RESOURCE PORTFOLIOS FOR 2023-2024  
TRANSMISSION PLANNING PROCESS**

Evelyn Kahl,  
General Counsel and Director of Policy  
Lauren Carr,  
Senior Market Policy Analyst  
CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION  
One Concord Center  
2300 Clayton Road, Suite 1150  
Concord, CA 94520  
Telephone: (415) 254-5454  
E-mail: [regulatory@cal-cca.org](mailto:regulatory@cal-cca.org)

November 10, 2022

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	THE COMMISSION SHOULD COMMIT TO STUDYING TRANSMISSION UPGRADES NEEDED TO ELIMINATE RELIANCE ON GAS RESOURCES IN LOCAL AREAS.....	2
III.	THE COMMISSION SHOULD CONFIRM THE PROPOSED PORTFOLIOS MEET A 1-IN-10 RELIABILITY STANDARD AS CAL ADVOCATES, SCE, AND SDG&E SUGGEST.....	3
IV.	CONCLUSION.....	4

## **SUMMARY OF RECOMMENDATIONS**

- The California Public Utilities Commission (Commission) should commit to studying transmission upgrades needed to eliminate reliance on carbon emitting resources in local areas; and
  - The Commission should confirm the proposed portfolios meet a 1-in-10 reliability standard as the Public Advocates Office at the California Public Utilities Commission, Southern California Edison Company, and San Diego Gas and Electric suggest.
-

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

R.20-05-003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING  
COMMENTS ON ELECTRICITY RESOURCE PORTFOLIOS FOR 2023-2024  
TRANSMISSION PLANNING PROCESS**

The California Community Choice Association<sup>1</sup> (CalCCA) submits these Reply Comments in response to the *Administrative Law Judge's Ruling Seeking Comments on Electricity Resource Portfolios for 2023-2024 Transmission Planning Process* (Ruling), issued on October 7, 2022. CalCCA's Reply Comments respond to the October 31, 2022 Opening Comments on the electricity resource portfolios for the 2023-2024 Transmission Planning Process (TPP).<sup>2</sup>

**I. INTRODUCTION**

The Ruling and Opening Comments accurately reflect the importance of developing new transmission to support the electric system reliability and integration of clean energy resources to

---

<sup>1</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

<sup>2</sup> All references herein to party Opening Comments are to the October 31, 2022 Comments filed in this Rulemaking (R.) 20-05-003.

support greenhouse gas (GHG) reduction targets. Opening Comments also reflect the need for a holistic assessment of resources, transmission, and their locations to ensure planning results in reliability and GHG-reductions at least cost. To address this need, the California Public Utilities Commission (Commission), in collaboration with the California Independent System Operator (CAISO), must begin to plan at a more localized level as opposed to only on a system level, within the Integrated Resource Planning (IRP) process and TPP. The Commission must also ensure that it relies on the necessary studies to determine whether the planning portfolios meet targeted reliability standards. For the reasons set forth below, CalCCA recommends that:

- The Commission should commit to studying transmission upgrades needed to eliminate reliance on carbon-emitting resources in local areas; and
- The Commission should confirm the proposed portfolios meet a 1-in-10 reliability standard as the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Southern California Edison Company (SCE), and San Diego Gas and Electric (SDG&E) suggest.

## **II. THE COMMISSION SHOULD COMMIT TO STUDYING TRANSMISSION UPGRADES NEEDED TO ELIMINATE RELIANCE ON GAS RESOURCES IN LOCAL AREAS**

Several parties raise the importance of studying the ability to reliably serve load in local areas and disadvantaged communities. SDG&E expressed concern that mapping too many generic resources not located within SDG&E's area runs the risk of unintended transmission system overloads.<sup>3</sup> California Energy Storage Alliance (CESA) recommends the Commission use the busbar mapping results to inform procurement specific to local capacity areas and disadvantaged communities to incent procurement that will replace existing, aging capacity and avoid ratepayer cost increases.<sup>4</sup> The California Environmental Justice Alliance (CEJA) and Sierra Club recommend the Commission include a retirement sensitivity portfolio that examines

---

<sup>3</sup> SDG&E Opening Comments at 2-3.

<sup>4</sup> CESA Opening Comments at 10-11.

the retirement of gas plants in disadvantaged communities, which are largely located in local capacity areas.<sup>5</sup>

These Opening Comments highlight that IRP must begin to more explicitly study resource and transmission needs in local areas. Many local areas currently rely on fossil fuel resources to maintain reliability and meet local resource adequacy requirements. Each year, the CAISO enters into reliability must-run (RMR) contracts with local resources looking to retire because they are necessary to retain for local reliability. The ability to retire fossil fuel resources in local areas will depend on either (1) eliminating transmission constraints that limit the number of resources capable of serving load in the local area, or (2) bringing online enough effective carbon-free resources inside of the local area to replace the existing fossil fuel resource. The Commission and the CAISO must begin studying the feasibility and cost-effectiveness of transmission alternatives and new clean resource alternatives in local areas. Therefore, the next portfolios transmitted from the Commission to the CAISO for study in the TPP should contemplate the retirement of fossil fuel resources in the local areas. This will result in forward planning that ensures an orderly and reliable transition from reliance on fossil fuels in local areas at least cost.

### **III. THE COMMISSION SHOULD CONFIRM THE PROPOSED PORTFOLIOS MEET A 1-IN-10 RELIABILITY STANDARD AS CAL ADVOCATES, SCE, AND SDG&E SUGGEST**

CalCCA agrees with the recommendations made by Cal Advocates, SCE, and SDG&E that the Commission should confirm the proposed portfolios meet the 1-in-10 loss of load expectation (LOLE) standard.<sup>6</sup> The portfolios and load forecast proposed in the Ruling differ

---

<sup>5</sup> CEJA and Sierra Club Opening Comments at 3.

<sup>6</sup> Cal Advocates Opening Comments at 4, SCE Opening Comments at 3-4, and SDG&E Opening Comments at 2.

significantly from those tested in the previous LOLE study. When resources and load change significantly from when the initial LOLE study was conducted, CalCCA agrees with SCE that it is not reasonable to simply hold the planning reserve margin constant and assume the portfolio meets the 1-in-10 standard.<sup>7</sup> Instead, the Commission should run a separate LOLE study with the new portfolio to check that it meets reliability standards. It is critical that the Commission perform the necessary LOLE studies on the proposed portfolios upon significant changes to the initial portfolio to ensure that the new portfolio will result in reliable electric service.

#### **IV. CONCLUSION**

For all the foregoing reasons, CalCCA respectfully requests consideration of the Reply Comments herein and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



Evelyn Kahl,  
General Counsel and Director of Policy  
CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION

November 10, 2022

---

<sup>7</sup> SCE Opening Comments at 3-4.