

California Community Choice Association

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Contact

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1. Please provide your organization's comments on Reliability-driven Projects Recommended for Approval.

See response in Section 4.

2. Please provide your organization's comments on Frequency Response.

CalCCA has no comments at this time.

3. Please provide your organization's comments on Maximum Import Capability Expansion Requests.

CalCCA has no comments at this time.

4. Please provide your organization's comments on Policy-driven Projects Recommended for Approval.

Introduction

The California Community Choice Association (CalCCA) appreciates the California Independent System Operator (CAISO) staff's significant efforts to develop the 2023-2024 Draft Transmission Plan (the Plan). The Plan makes good progress in advancing transmission projects needed for grid reliability and needed to support 85 gigawatts of the new clean generation to meet Senate Bill 100 goals. The plan identifies 26 transmission projects, totaling an estimated cost of \$6.1 billion. Nineteen of the projects are reliability-driven and seven are policy-driven. Six of the seven policy--driven projects identified in the plan are driven by the offshore wind (OSW) generation mapped in the Humboldt call area. The cost estimate of these six projects is \$3.1-\$4.5 billion, a significant portion of the \$6.1 billion total estimated costs of the plan. CalCCA supports the adoption of the reliability-driven projects identified in the Plan. For the policy-driven projects, CalCCA recommends the approval process outlined below intended to ensure transmission planning takes into account upcoming regulatory steps likely to inform the pace of OSW development in the state.

Proposed Approval Process for Policy-Driven Projects

Given the significant cost associated with the policy-driven projects identified in the plan and the fact that OSW generation development across the country is still in its infancy, the CAISO should develop a two-step approval process that provides additional time for forthcoming regulatory steps to inform the pace of OSW development in the state. Pursuant to Assembly Bill (AB) 1373, the California Public Utilities Commission (CPUC) must determine if there is a need for the California Department of Water Resources (CDWR) to procure eligible energy resources, including OSW, by September 1, 2024. The direction provided by the CPUC in response to the requirements of AB 1373 will likely inform the need for OSW and at least some of the anticipated procurement steps necessary to meet such a need. The CAISO should wait to request the CAISO Board of Governors' approval of certain policy-driven projects until after September 1, 2024, to allow for additional time to take into account the direction provided by the CPUC in response to its AB 1373 requirements. The CAISO should determine which projects to approve in May versus September as follows:

- Request Board of Governors' approval in May if a project is:
 - Reliability-driven; or

- Policy-driven, identified in the plan for its ability to support the interconnection and transmission of OSW, and would have been found to provide benefits absent the inclusion of OSW in the portfolio (e.g., the interconnection of alternative clean generation downstream such as the 230 kilovolt (kV) mitigations in the PG&E North of Greater Bay Area).
- Request Board of Governors' approval in September (or later in 2024 if needed) if a project is:
 - Policy-driven, *only* identified in the plan for its ability to support the interconnection and transmission of OSW and does not meet other policy-driven needs absent the inclusion of OSW in the portfolio.

Some policy-driven projects identified in the plan are driven by OSW but offer additional benefits of allowing for the interconnection of other non-OSW clean energy projects (the 230 kV mitigations in the PG&E North of Greater Bay Area). Other policy-driven projects may not provide benefits to the system absent OSW (the 500 kV infrastructure). The approach outlined above will provide the CAISO with the flexibility needed to ensure that, in the event OSW does not get developed as quickly as anticipated or shifts to a different area, transmission investments will not be stranded and will serve the purpose of integrating different sets of clean resources to the grid. Such a "least regrets" approach is prudent to support customer affordability while also developing the transmission infrastructure needed to support the interconnection of new clean generation.

5. Please provide your organization's comments on the Economic Assessment.

CalCCA has no comments at this time.

6. Please provide your organization's additional comments on the Draft 2023-2024 Transmission Plan April 9, 2024 stakeholder call discussion.

CalCCA has no comments at this time.