



Comments of the American Wind Energy Association of California (AWEA-California) on the CAISO's June 3, 2020 Stakeholder Meeting on the 2020-21 TPP

June 17, 2020

Introduction

AWEA-California appreciates the opportunity to comment on the 2020-21 Transmission Planning Process (TPP) and, specifically, the stakeholder meeting that was held on June 3, 2020. AWEA-California offers support, and appreciation, for stakeholder meetings at this juncture in the annual TPP process. Additionally, as part of the wildfire risk assessment work that is being completed this year, to the extent that CAISO evaluates new upgrades to reduce risk, AWEA-California encourages the CAISO to prioritize the consideration of upgrades that might be able to serve multiple purposes, such as increasing capacity to deliver renewable energy resources. Finally, AWEA-California urges the CAISO to conduct an additional sensitivity as part of the 30 MMT portfolio, one which would provide invaluable information into California's ongoing planning processes, most notably the Integrated Resource Planning (IRP) process.

Support for a Stakeholder Meeting at this Stage of the TPP

On June 3rd, CAISO held a stakeholder call on the 2020-21 TPP. The call provided stakeholders with a number of updates on studies being conducted as part of this year's TPP and provided an overview of methodologies and study assumptions for the wildfire risk assessment and energy storage busbar mapping. An update on Interregional Transmission Projects (ITPs) was also provided. A stakeholder meeting at this juncture of the annual TPP is not part of CAISO's "typical" stakeholder engagement. AWEA-California found this meeting to be helpful and well timed and appreciates CAISO's hosting of such a meeting. CAISO should consider making this type of stakeholder update (in early summer) standard for TPPs going forward. It is useful for stakeholders to engage at this point, before draft results are actually available.

CAISO Should Identify "Other" benefits Associated with Upgrades to Mitigate Wildfire Risk

During the June 3rd meeting, CAISO reviewed its approach to the wildfire risk assessment that is being conducted as part of the 2020-21 TPP. As CAISO performs this assessment, to the extent that new upgrades are being evaluated, CAISO should review whether upgrades might be able to serve multiple purposes and provide enhanced benefits. For instance, an upgrade that might help address wildfire risk, while also increasing transmission capacity from a renewable energy zone, that upgrade should be prioritized and the incremental capacity identified clearly in the study results CAISO provides. Another example of an incremental benefit that CAISO should evaluate in assessing upgrades that might mitigate fire risk, is reducing local capacity requirements. To the extent upgrades are identified in CAISO's report on wildfire mitigate risk,



CAISO’s study report should clearly identify any additional benefits of those potential upgrades (including those outlined above).

Value of a Deliverability Assessment on the 30 MMT Portfolio

Finally, though not specifically discussed during the stakeholder meeting, AWEA-California urges CAISO to perform a “sensitivity” deliverability case for the 30 MMT Energy-Only (EO) portfolio, under which the resources in this portfolio are assumed to be Full Capacity Deliverability Status (FCDS) rather than EO. This type of study effort would assist the CAISO and the California Public Utilities Commission (CPUC) in identifying the most cost-effective transmission solution in a deep decarbonization future, in a manner that is consistent with contracting practices. While the 30 MMT portfolio provided by the CPUC for CAISO to analyze as a sensitivity in the 2020-21 TPP heavily relies on EO renewable resources, it is important to note that currently, solicitations generally require resources to have FCDS. Even if FCDS is not an absolute requirement, it’s highly unlikely that an EO resource can be successful in a solicitation considering the reality of needing to compete with FCDS resources in all source solicitations.

Given the commercial realities that favor FCDS, it would be incredibly valuable for the CAISO, CPUC, LSEs, renewable developers, and other stakeholders to better understand the transmission upgrades (and associated costs) that would be required in order to transition to a deeply decarbonized future where renewable resources provide energy, resource adequacy, and other ancillary services. This could be accomplished by analyzing the 30 MMT portfolio of resources, but not relegating any of the resources in the portfolio to EO and rather studying all resources as FCDS. The results of this type of assessment could be utilized in future IRP processes and would provide additional information to the CPUC IRP process on the cost of transmission upgrades that would be necessary to match contracting practices }. The time is now to perform this type of study, so that these transmission upgrades and renewable resource portfolios can be considered in current and future IRP processes. This information would not need to result in approval of any of these upgrades by CAISO at this time, but would provide valuable information on costs and upgrades required for a deeply decarbonized and fully deliverable resource portfolio.

Conclusion

AWEA-California appreciates CAISO’s consideration of these comments and CAISO’s efforts to conduct the 2020-21 TPP. We look forward to continuing to work in collaboration with the CAISO on transmission planning process.