



Consolidated Edison Development Comments on the CAISO's 2019-2020 Transmission Planning Process November 18, 2019 Stakeholder Meeting

Consolidated Edison Development, Inc. (CED) appreciates the opportunity to provide comments on the CAISO's 2019/2020 Transmission Planning Process. CED is a leading developer of solar, wind and battery storage throughout the United States. CED is a wholly-owned subsidiary of Con Edison Clean Energy Businesses, Inc., which is a wholly-owned subsidiary of Consolidated Edison, Inc. (CEI), one of the nation's largest investor-owned energy companies. CED currently owns and/or operates over 2.6 GW of renewable energy projects, a significant portion of which operates in the CAISO's markets.

At the November 18 meeting, in connection with the CAISO's preliminary economic study results, the CAISO identified the Fresno Avenal area upgrade (Gates-Tulare Lake 70 kV line) as a high priority study area to receive further, detailed simulation and economic assessment. CED **strongly supports** further economic study of the Fresno Avenal area upgrade (Gates-Tulare Lake 70 kV line). CED's operating assets in the Avenal area have experienced frequent curtailments arising from peak season of Exception Dispatches which has resulted in lost renewable energy production delivered to the grid and suspects these losses will continue to grow absent a solution.

While the CAISO's initial economic analysis indicates that the overall market costs of congestion in the Fresno area are currently relatively modest, the magnitude of congestion in the Fresno area are significant, and outpaced only by the Path 42 IID-SCE and PG&E/TID Exchequer Branch Groups in the Sensitivity 1 portfolio, and only PG&E/TID Exchequer in the Sensitivity 2 portfolio. Clearly, the magnitude of congestion hours in the Fresno area warrants further study. The proposed economic study of the Fresno Avenal area upgrade is an important first step in addressing the long duration/frequency of congestion, which has a commercial impact on generation in the area.