

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to comment on the September 20-21st meeting on the Transmission Planning Process. CEERT offers the following comments specifically on the Informational Study on Increased Transfer Capabilities of Low Carbon Electricity between the Pacific Northwest and California and on the need for a more comprehensive study of the LA Basin in the 2019-20 Transmission Planning Process(TPP).

Informational Study on Increased Transfer Capabilities of Low Carbon Electricity between the Pacific Northwest and California

In previous comments on the Information Study on Increased Transfer Capabilities of Low Carbon Electricity between the Pacific Northwest and California, CEERT has advocated for increased coordination between CAISO and Los Angeles Department of Water and Power (LADWP) and scenarios with regional clean energy build out in the Pacific Northwest. CEERT applauds the collaborative effort put forward by the CAISO in working with LADWP, the Northwest Power and Conservation Council, and the Pacific Northwest hydro owners in this effort. Continued coordination with LADWP is essential, given the interconnected nature and changing dynamics in the LA Basin. Continued coordination with the Pacific Northwest entities is essential for ensuring best practices for hydro modelling. The accuracy of the hydro modelling will have a significant impact on the value of the study's results.

There should be clarification on what "potential benefits of increased transfer capabilities" means. Does "increased transfer capabilities" mean simply increased transfers with the current infrastructure or with physical changes to increase transfer capabilities? Potential infrastructure development that could increase transfers should be identified for further study in the next round of the TPP. The study results should include identification of non-physical constraints on increased transfer capabilities, such as export charges or the timing of resource adequacy contracting.

Comprehensive Study of the LA Basin in the 2019-20 TPP

The Pacific Northwest California Transfers study, LADWP's Once Through Cooling Study, Los Angeles's decarbonization goals and 100% renewables study, the goal of closing Aliso Canyon, the passage of Senate Bill 100, and Executive Order B-55-18 all underscore the need for an integrated LA Basin study. Such lofty goals require coordination between the CAISO and LADWP in studying the best solutions, due to the interconnected nature of the grid in LA Basin. As the topography of the grid changes, impacts to both balancing authorities must be considered. As both the CAISO and LADWP have both undertaken studies to begin identifying means to decarbonize the LA Basin, the 2019-20 round of the TPP should include a joint process between CAISO and LADWP to more thoroughly evaluate needs to achieve both short terms goals of eliminating dependence on Aliso Canyon and increasing resilience of the LA Basin as gas generators retire and the long terms goal of decarbonization are achieved. In addition, such a study should include additional transmission access to Glendale and Burbank, whether a direct tie to CAISO or increased capacity on the Victorville-LA path, so that both of these small utilities have options to respond to the twin policy objectives of decarbonization and retirement of Aliso Canyon.