Submit comment on Transmission Development Forum

EDF-Renewables appreciates this opportunity to submit brief comments on the Q3 2023 Transmission Development Forum.

IC project financing
EDF-R appreciates PG&E opening the discussion for PTOs to consider accepting material support from the IC if it mitigates a project delay. PG&E’s proposal appears to be limited to ICs providing some kind of funding to support transmission upgrades. EDF-R requests for PG&E to also consider other opportunities. For example, in the past EDF-R has offered to procure delayed equipment through its own contracts and contacts to mitigate a delayed milestone and the PTO rejected the offer. EDF-R seeks to partner with the PTO in solutions for these types of issues. EDF-R requests PG&E to provide more information for public discourse on the topic to foster engagement and dialogue with ICs.

TPP-approved GLW/VEA Area Upgrades project
EDF-R seeks clarification on the GLW/VEA Area Upgrades project ISDs. The TPP-approved GLW/VEA Area Upgrades project encompasses a revised scope, excerpt below. GLW/VEA was not present at the Q3 2023 Transmission Development Forum, and the CAISO staff indicated they did not expect GLW/VEA to attend the next forum barring major information updates. Although with the revised scope, associated CAISO queued projects likely do not need all the individual components listed below to achieve their respective ISD/COD. EDF-R request for GLW/VEA to provide ISD status updates broken down by each component, or grouped components if they are intended to achieve the exact same ISD. This will help ICs to better monitor the progress on their project specific upgrades.

“The recommended revised scope of the GLW/VEA Area Upgrades project scope is as follows:

- Install a new Trout Canyon 500 kV bus and three 500/230 kV transformers at Trout Canyon;
- Rebuild Trout Canyon – Sloan Canyon 230 kV DCTL lines to 500 kV DCTL lines;
- Rebuild Northwest – Desert View, Pahrump – Gamebird and Gamebird – Trout Canyon 230 kV to double circuit lines;
- Rebuild Innovation – Desert View 230 kV No.1 line with a normal rating of 1,154 MVA and an emergency rating of 1,578 MVA;
- Install a second Innovation – Desert View 230 kV line;
- Rebuild Innovation – Pahrump 230 kV line;
- Add a 500/230 kV transformer at Sloan Canyon and loop in the Harry Allen – Eldorado 500 kV line;
- Install a 138 kV phase shifter at Innovation on the planned tie-line to NVE; and
- Upgrade VEA’s 230/138 kV Amargosa transformer.”