

GLW Comments on the 2018-2019 Transmission Planning Process Meeting on 11/16/18

GridLiance West LLC (GLW) appreciates the opportunity to comment on the stakeholder meeting held on November 16, 2018 regarding CAISO's preliminary policy and economic assessment results issued in the 2018-2019 transmission planning process (TPP). GLW appreciates the detailed presentation that CAISO prepared for this stakeholder meeting and references specific slides from that presentation in these comments.

First, GLW seeks clarification on the material CAISO presented related to its 2018-2019 TPP Policy-Driven Assessment, specifically on slide 45, "Key observations: Renewable curtailment, Further investigation of PCM simulations and exploration of options" (page 56 of the PDF) and on slide 46, "Next Steps" (page 57 of the PDF). Specifically, GLW would like to understand whether CAISO believes it an appropriate and ordinary outcome of the TPP that constraints would be identified, and whether these constraints would then be targeted for policy projects or economic projects. The language on these slides seems to suggest that the constraints identified were not ordinary, but instead are "distortions" or are in some other way anomalies that need to be managed in the modeling process rather than in TPP solutions. GLW also would like to understand if the constraints are to be managed in the modeling process, and if so, what mechanism would be used and how that would be accomplished.

GLW is concerned that CAISO may intend to reduce the energy-only deliverability capacity with the CPUC's IRP process rather than considering constraint resolutions through the TPP. GLW would appreciate clarification on whether that is CAISO's intent and, if so, requests further information about why CAISO believes the constraints that are arising are outside of what is expected to occur through the study of the portfolios in the TPP. GLW seeks further explanation and clarification from CAISO about the intended process and any special consideration that is being applied to the VEA-area constraints and if they are in some way warranting treatment which is outside of the expected process.

Second, GLW believes stakeholders would benefit from more explanation on the Deliverability Assessment Methodology Proposal outlined on slides 9 through 41 (pages 20 to 52 of the PDF). For example, GLW believes it would be useful if CAISO provided additional information regarding the proposed calculation and assumptions underlying the new proposal. GLW would be able to use such information to assess any impacts to its planning and operations, which would assist in its overall assessment of the new methodology. As other stakeholders expressed in the TPP stakeholder meeting held on November 16, 2018, GLW respectfully requests that CAISO hold a separate workshop to give a more in-depth explanation of the proposed methodology, including an additional opportunity for comment, prior to implementation.