

**Comments of GridLiance West LLC on
CAISO's 2019-2020 TPP Stakeholder Meeting on September 25-26, 2019**

October 9, 2019

GridLiance West LLC (GLW) appreciates the opportunity to comment on the stakeholder meeting held on September 25-26, 2019, regarding CAISO's Draft Transmission Plan for the 2019-2020 Transmission Planning Process (TPP). GridLiance West appreciates the detailed presentation that CAISO prepared for this stakeholder meeting. GridLiance West raises herein a number of questions and other items of concern for the CAISO's consideration.

1. Comment on Remedial Action Schemes for Policy-Driven Assessment Mitigation

GridLiance West requests that CAISO consider transmission upgrade projects when analyzing the system for mitigation plans in the policy assessment. The status quo alternative of increasing the number of Remedial Action Schemes (RAS) needed to protect against grid contingencies is not recommended. GridLiance West's preferred alternative would be to rebuild existing transmission lines to decrease dependency on RAS installations. New transmission capacity represented by infrastructure improvements rather than through use of mitigation processes will strengthen the electrical grid and increase overall grid reliability. Also, increasing the transmission capacity would support the CAISO system's ability to achieve the CPUC's greenhouse gas emission reduction targets for 2030.

GridLiance West believes exploring transmission system upgrade alternatives would be beneficial and strongly encourages CAISO to do so. If CAISO does not intend to include transmission upgrade projects as alternatives to RAS installations in the policy case, GridLiance West requests an explanation why CAISO has declined to do so.

2. Request for Clarification Regarding the TPP Policy-Driven Assessment Methodology

CAISO staff showed a schematic on electronic slide 219 of how the Deliverability Assessments and the Production Cost Simulations feed into the next cycle of the IRP. Given the transmission availability limits CAISO provided to CPUC in 2018, based primarily on the Deliverability Assessment, it is unclear whether the production cost model ever provides information into the IRP other than to potentially further restrict IRP buildout siting. In other words, given that for all but one CREZ area, CAISO's deliverability-based limits prevented renewable buildout in those affected areas. As a result, the production cost modeling in TPP will never find constraints to evaluate in those CREZs or sub-CREZs. GridLiance West continues to encourage the CAISO staff to consider how they could examine in the TPP those constraints that were indicated by the deliverability assessment to ensure through production cost modeling that the limits and costs for exceeding the limits are also proven out in the production cost modeling.

Similarly, GridLiance West encourages CAISO to reconsider the method by which it defines energy-only inputs to CPUC. The simple rule applied in 2018 – to not allow any energy only resources beyond the level of dispatchable (e.g., thermal) resources in an area - seems to offer no assurance of an optimal generation/transmission mix.

GridLiance West would like additional details about the CAISO's siting assumptions associated with the resource sets labelled "new build" in the 2018/2019 IRP portfolio. It seems the siting of these resources was left to the CAISO TPP staff. GridLiance West requests that the staff share the MW quantity, resource type and bus of the mapping of those renewables in the IRP portfolio.

We appreciate CAISO's consideration of these items.

Sincerely yours,

A handwritten signature in black ink that reads "Jody Holland". The signature is written in a cursive, flowing style.

Jody Holland

Vice President, Planning & Engineering