

**Comments of GridLiance West LLC on
CAISO's 2020-2021 Draft Transmission Plan and Transmission Planning Process Meeting on
February 9, 2021**

February 23, 2021

GridLiance West LLC (GridLiance) appreciates the opportunity to comment on the CAISO's 2020-2021 Draft Transmission Plan and the stakeholder meeting held on February 9, 2021. GLW offers comments on several aspect of the CAISO's draft plan and Transmission Planning Process (TPP).

GridLiance Appreciates CAISO's Study of Policy Sensitivity Case 2 Addressing Expanded Energy-Only Limits

GridLiance appreciates the CAISO's expeditious analysis of the CPUC's Policy Sensitivity case 2, addressing the Energy-Only (EO) limits used in the CPUC's IRP process. Many of the results of the analysis were used by the CPUC in its mapping of resources to locations for its most recent portfolios – those that will be used for the CAISO's 2021-2022 TPP. The CAISO's analysis enabled additional siting of IRP resources in low-cost areas and provided information for the CPUC to use in that assessment. GridLiance commends the CAISO for producing those results in time to inform the portfolios.

IRP Would Greatly Benefit from A Revised Transmission Capabilities Paper

The CAISO produced an Transmission Capabilities [White Paper](#) to inform the CPUC's IRP regarding transmission limits in May of 2019, and the information in that white paper has been heavily relied on by the CPUC IRP team and stakeholders since that time. However, the CAISO in many instances has more current information about the transmission capabilities. Some of this information is a result of the transmission capabilities findings resulting from Policy Sensitivity Case 2. While the draft plan reports on instances where there were, or were not, limitations in energy flows from the expanded EO siting, it does not include a concrete summary confirming that the studied EO limits can be met at zero cost in most instances and at the costs of estimated upgrades for the GLW area and the Whirlwind and Westlands areas. Further, the proposed decision transmitting the IRP portfolios and the final decision issued allude to additional information from the CAISO about capabilities – primarily from its GIDAP studies. GridLiance strongly encourages the CAISO to revise the Transmission Capabilities White Paper to provide an unambiguous source for the CPUC's use in the upcoming IRP cycle. As part of this process GridLiance would hope the CAISO would issue such a paper in draft form, host a web meeting to present the information, and seek any questions or comments from stakeholders before finalizing the paper to ensure it is clear and vetted. This will ensure the CAISO's efforts from its 2020-2021 TPP offer the most value in the IRP process and avoid unnecessary controversies during the conduct of that study.

GridLiance Seeks Clarification Regarding Proposed FCDS Treatment in IRP

GridLiance understands from the February 9, 2021 stakeholder meeting that the CAISO intends to recommend to the CPUC that the Transmission Plan Deliverability (TPD) methodology be embedded within the RESOLVE code such that RESOLVE can dynamically determine the deliverability limits. GridLiance first wishes to clarify that this methodology within RESOLVE would pertain to the FCDS limits and not the EO limits used in RESOLVE. (If GridLiance's interpretation is incorrect we ask the CAISO to clarify the relationship of the TPD methodology and the EO limits.) Other than this clarification, GridLiance simply questions what process will be put in place if the CPUC is not able to embed the methodology within RESOLVE.

GridLiance Requests That the CAISO Hold a Dedicated Policy Discussion on the Use of RAS and SPS Solutions in Lieu of Transmission Upgrades

At the levels of renewable build out called for in the Base Case and Policy Change Case portfolios the CAISO's transmission grid is becoming increasingly taxed. Yet in this 2020-2021 draft plan the CAISO is recommending no policy or economic upgrades. The reliance on RAS and SPS schemes continues to grow. GridLiance and other stakeholders could benefit from a dedicated discussion of the CAISO's grid planning standards in this regard, including a discussion of costs and benefits of reliance on such schemes – especially in light of the WECC August heat storm events and the catastrophic outcomes of outages demonstrated in the ERCOT region this month. Continuing to stress the grid by choosing RAS and SPS schemes does not afford the CAISO grid users the benefits of transmission enhancements and it denies them the benefit of the energy deliveries that have to be curtailed by the CAISO under stressed conditions.

The draft plan indicates that the CAISO's choices of how to enforce constraints and protect the grid in its planning studies are according to the grid planning standards. Yet these impacts of curtailment schemes and not enforcing contingencies has growing real-world significance. NERC and WECC standards including TPL-001-4 concerning the long-term reliability of the transmission grid must be carefully considered in relationship with CAISO's current practices to use RAS and SPS to drop load, curtail generation, and delay long-term transmission solutions in light of future green goals and mandates. For these reasons we request that the CAISO hold a dedicated discussion of the merits of its planning choices regarding the use of RAS and SPS approaches to avoid upgrades, even when such schemes are technically allowed by published standards.

Summary

GridLiance very much appreciates the CAISO's collaboration with the CPUC to develop the EO Expanded study and appreciates the CAISO's efforts that accelerated results from that study to support the 2021-2022 TPP portfolios. GridLiance looks forward to CAISO capturing the results of that analysis and other recent transmission capability information in a revised Transmission Capabilities white paper to provide unambiguous guidance to the CPUC and to allow an opportunity for the "bottom line" findings to be

vettted among stakeholders. Lastly, GridLiance encourages the CAISO to host a more general policy discussion on the application of RAS and SPS schemes as transmission solutions in lieu of upgrades.

Sincerely yours,



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