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Comment of Golden State Clean Energy on Transmission Capability Estimates for Use in the CPUC's Resource Planning Process

Golden State Clean Energy ("GSCE") submits this comment on the California ISO's white paper, *Transmission Capability Estimates for Use in the CPUC's Resource Planning Process*, and the stakeholder meeting discussing the white paper held on July 5, 2023.

The CAISO's updated white paper is critical to the ongoing resource portfolio development effort in the integrated resource planning ("IRP") proceeding. One of the main focuses of the IRP's 2023 inputs and assumptions update and the development of subsequent resource portfolios should be determining how the portfolios will impact CAISO's transmission planning process, considering the significant amount of capacity now included in resource portfolios and the inability of the existing transmission system to accommodate the required new capacity. CAISO and the California Public Utilities Commission ("Commission") must ensure a robust set of transmission upgrades is available for RESOLVE to consider, especially in priority transmission zones.

Specifically, CAISO and the Commission should work together to target and prioritize transmission infrastructure development in zones where significant resource development will occur and zones with least conflict lands aligned with the recent CEC land use screens (for example, the Greater Fresno and Kern areas). The Greater Fresno and Kern areas can provide a significant amount of cost-competitive solar and storage resources that can be accessed with fewer permitting and environmental challenges.

Supplementing the White Paper with 20-Year Transmission Outlook Findings

GSCE recommends that CAISO supplement the white paper with transmission facilities the CAISO previously found needed in the 20-Year Transmission Outlook. This prior effort identified significant transmission resources that could be required by 2040. Given the siting, permitting, and construction challenges associated with new, large-scale transmission development, it is appropriate to incorporate the 20-Year Transmission Outlook facilities into with the IRP portfolio analysis now. The IRP will develop resource portfolios that extend to 2039, and the 20-Year Transmission Outlook upgrades need to be incorporated now to ensure consistency.

The transmission upgrades identified in the 20-Year Transmission Outlook are also needed to better diversify the white paper's list of ADNUs in PG&E's Fresno and Kern areas. The 20-Year Transmission Outlook includes high voltage lines and a new 500/230 kV substation in the Fresno/Kern areas, but the white paper generally does not include these more significant types of upgrades in the Fresno/Kern areas. In contrast, other solar areas like SCE Eastern include a number of new high voltage lines for the IRP to consider, leaving a disparity in transmission upgrade inputs that will cause IRP and TPP results to continue to disproportionately favor development in Southern California. Disturbed, water challenged, and SGMA-impacted agricultural lands in the Central Valley are more environmentally viable than public lands in SCE Eastern, where permitting and other challenges can extend the development timeline of transmission and generation and create impediments to scaling development in this region to meet California's SB 100 goals.

Given the generator interconnection reforms CAISO is undertaking to reduce future interconnection requests and limit them by transmission zone (and possibly further limit them to align with IRP planning), it is appropriate for CAISO to consider its new zonal planning efforts when determining what transmission facilities to provide in this white paper. Further focusing on zones where significant resource development will occur (i.e., where developers have site control for significant development) and that align with the CEC's land use screens will ensure CAISO's zonal approach is in furtherance of state land use policies while also guiding resource development in alignment with the 20-Year Transmission Outlook.

Insight into Incremental Capacity

GSCE believes that it would be beneficial for the market to better understand how a particular ADNU can create the amount of incremental deliverability that is provided in the white paper. We seek additional information that illuminates how the ADNUs support the incremental deliverability that is unlocked for the corresponding transmission constraint.

Conclusion

The CAISO should focus its efforts on providing the IRP with as much transmission upgrade information as possible in priority transmission zones (i.e., zones where significant resource development will occur and that contain least conflict lands that align with the recent CEC land use screens). Some of the transmission upgrades provided in the white paper need to be sized sufficiently to accommodate forward-looking policy goals while enabling new resources in the near-term that are in commercially viable zones. This is particularly true in the Fresno and Kern areas, where there is an absence of major high voltage upgrades in the white paper that are needed to unlock the significant solar and storage potential. Looking toward the 20-Year Transmission Outlook can address both of these issues while using an existing CAISO study. We appreciate CAISO's consideration of these comments.

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Respectfully submitted,

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