

CAISO 2020/21 Transmission Planning Process June 3rd Meeting: Stakeholder Comments

Submitted by	Company	Date Submitted
Sandeep Arora (sarora@lspower.com) (925) 201 5252	LS Power Development, LLC	6/17/20

LS Power appreciates the opportunity to provide comments on the June 3rd, 2020 stakeholder presentation for CAISO 2020-21 Transmission Planning Process (TPP).

LS Power's comments are limited to wildfire risk assessment portion of the presentation. At the stakeholder call CAISO proposed conducting an assessment to analyze risk of wildfires in high risk areas and identifying local areas being impacted by Public Safety Power Shutoff (PSPS) events in various parts of CAISO system. Preliminary findings from this analysis will be discussed with stakeholders in September 2020. This analysis is an attempt to help provide insights on measures that should be taken to prevent or reduce power shutdowns due to wildfires. LS Power supports this analysis. We believe this is a step in the right direction. Over last several years forced outages due to wildfires or planned outages such as PSPS events have become more routine in California. Not only are these events huge inconvenience & pose safety concerns to the society, these events also have huge economic impacts. According to some estimates PSPS events from Oct 2019 in Northern California had an economic impact of over \$2bn.¹

While CAISO has proposed a high level overview of how it intends to conduct this analysis, key details are missing. We recommend CAISO develop a study plan for this analysis and allow stakeholders an opportunity to provide inputs before it proceeds with the study. Since this is such a key study, we recommend CAISO seeking this additional input from stakeholders rather than proceeding as proposed where stakeholders only get an opportunity to see draft results in September 2020. We recommend CAISO add detailed information on the following topics in this study plan: 1) Which study areas will be prioritized for this study? 2) Which study scenarios will CAISO use for the study, including details on which multiple contingencies will the study consider? 3) Which study years will this study be conducted for? 4) How will Extreme Contingencies be handled & will CAISO propose transmission solutions to address such contingencies? 5) How will existing infrastructure hardening plans from PTOs be incorporated?

In addition to this, CAISO should provide more information on how the transmission projects that get proposed from this new analysis be considered for approval. Will these projects be classified as Reliability, Public Policy or Economic? Competitive solicitation framework should be utilized to the

¹ <https://www.cnbc.com/2019/10/10/pge-power-outage-could-cost-the-california-economy-more-than-2-billion.html>

extent possible such that ratepayers can benefit from cost savings that competition offers for new transmission projects. PTO existing infrastructure hardening projects should be carefully reviewed as these get incorporated into the analysis. Any existing infrastructure hardening projects that lead to a “net increase” in transmission capacity should be carefully studied by CAISO in TPP process rather than being rolled up in the transmission plan as a baseline assumption. Such projects should be compared with other new transmission solutions that may be more efficient and/or cost effective.

LS Power thanks CAISO for the opportunity to provide these comments for the 2020-21 TPP.