



Comments of Natural Resources Defense Council on the Draft 2018/19 TPP

February 28, 2019

NRDC appreciates the opportunity to provide comments to the CAISO on the Draft 2018-2019 Transmission Plan.

NRDC would like the CAISO to explore the 2000 MW net export limit. At the recent FERC Order 1000 Interregional meeting in Salt Lake City, there was discussion among stakeholders on how the CAISO and other FERC 1000 regions modeled export limits. CAISO has a 2000 MW restriction, while the other regions did not place this limit and discovered different findings. NRDC would like to see the CAISO dig into the data and model limitations. This limitation could be reducing benefits and driving up renewable curtailment in the region. Eliminating the export limit can result in a reduction in renewable resource curtailment and possible decreases in congestion in the CAISO footprint, which will create economic, reliability and public policy benefits to California. NRDC looks forward to working with CAISO and CPUC to re-evaluate the export limitations.

NRDC supports the work to ensure the dynamic stability simulations models demonstrate adequate dynamic stability performance and appreciate the importance to share the updates with WECC to help improve coordinated regional planning.

Lastly, NRDC looks forward to updates from the public policy slide 40 regarding next steps:

- Provide the updated transmission capability estimates to the CPUC and assist with incorporating these into the RESOLVE model
 - The ISO is currently working with the CPUC to ensure that nested constraints are considered
- Inform the IRP proceeding with insights regarding renewable curtailment and conceptual upgrades tested in 2018-2019 policy driven assessment
- Incorporate key findings from this study in coordinating with the CEC staff for mapping portfolio resources in zones with high likelihood of

severe local transmission constraints

- Develop framework based on CPUC-provided objectives for siting generic storage selected in CPUC IRP process

In summary, taking a closer look at the 2000MW export limit, improving dynamic stability simulations, sharing results, and giving updates on public policy next steps are all greatly appreciated efforts.

We thank the CAISO for the opportunity to submit these comments and look forward to continuing work with the CAISO.

Thank you,

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