

Stakeholder Comments Template

| Submitted by | Company | Date Submitted |
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These are Office of Ratepayer Advocates' comments to the 2015-2016 California Independent System Operator (CAISO)'s Transmission Planning Process (TPP).

The CAISO states in its draft 2015-2016 Transmission Plan:

*As a part of the 2015-2016 planning efforts, the ISO [Independent System Operator] conducted a separate and standalone review of a large number of local area low voltage transmission projects in the PG&E service territory that were predominantly load forecast driven and whose approvals dated back a number of years. In reviewing the continued need for those projects in light of materially lower load forecast levels since those projects were approved, the ISO took into account existing planning standards, California local capacity requirements, and deliverability requirements for generators with executed interconnection agreements. As a result of the review, 13 predominantly lower-voltage transmission projects that were found to be no longer required and are recommended to be cancelled. Only one of the 13, a 230 kV to 60 kV transformer addition, had a regional (e.g. greater than 200 kV) component.*¹

ORA agrees with the CAISO's recommendation to cancel 13 previously preapproved projects in PG&E's service territory. The CAISO states that these lower-voltage transmission projects are no longer required due to lower load forecast levels. Similarly, ORA recommends the CAISO reassess all previously preapproved projects within the entire CAISO's Balancing Authority Area to determine the necessity of those projects.

In the draft transmission plan, CAISO also states:

The ISO reviewed the need based upon:

- *Transmission planning process and applicable reliability standards (NERC standards, WECC regional criteria and ISO Planning Standards)*
- *Local Capacity Requirements*
- *Deliverability requirements for generators with executed interconnection agreements.*²

With the Governor's goal to have 12,000 MW of distributed energy resources (DERs) interconnected to the distribution grid in California, this will help provide power supply capacity to the distribution system and reduce the need for transmission infrastructure. Therefore, ORA recommends the applicability of the deliverability criteria in transmission planning be reevaluated to account for the development of DERs.

¹ Draft 2015-2016 Transmission Plan at 2.

² Draft 2015-2016 Transmission Plan at 93.