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COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR'S 2020-2021 TRANSMISSION PLANNING PROCESS UPDATE – JUNE 3, 2020 PRESENTATIONS AND STAKEHOLDER MEETINGS

June 17, 2020

The Public Advocates Office at the California Public Utilities Commission is California's independent consumer advocate with a mandate to obtain the lowest possible rates for utility services consistent with reliable and safe service levels, and the state's environmental goals.¹ The Public Advocates Office submits comments and recommendations on the following topics that the California Independent System Operator (CAISO) presented in its 2020-2021 Transmission Planning Process (TPP) stakeholders meeting held on June 3, 2020: 1) Wildfire Risk Assessment, including aspects relating to Public Safety Power Shutoff (PSPS) events,² 2) San Diego Gas & Electric Company's (SDG&E) area sub-transmission project re-evaluation, and 3) storage mapping and resource retirement.

Discussion and Recommendations

1. Wildfire Risk Assessment and PSPS Mitigation Plans

The CAISO indicates it is collecting and will utilize wildfire-related information in its transmission planning process, developing potential wildfire scenarios for transmission planning assessment, and examining the impact of PSPS on the transmission system and how to mitigate PSPS events.³ The CAISO also indicates that it will discuss its preliminary findings on this topic during the September 2020 stakeholders meeting.⁴

¹ California Public Utilities (Cal. Pub. Util.) Code § 309.5.

² PSPS is also referred to as de-energization. De-energization is the process by which utilities turn off electricity, usually to reduce the risk of utility-infrastructure wildfire ignitions.

³ Wildfire Mitigation Assessment Update, 2020-2021 Transmission Planning Process Stakeholder Meeting, June 03, 2020, slides 8-11.

⁴ Wildfire Mitigation Assessment Update, 2020-2021 Transmission Planning Process Stakeholder Meeting, June 03, 2020, slide 14.

The Public Advocates Office recommends that the CAISO integrate and incorporate the eight electrical corporations' 2020 wildfire mitigation plans⁵ that were ratified by the California Public Utilities Commission into the TPP to avoid duplication of projects and unnecessary costs to ratepayers. Specifically, the CAISO should account for wildfire mitigation projects that the electrical corporations' plan to undertake, either to reduce the risk of wildfire ignition from transmission infrastructure or to reduce the frequency and scope of PSPS events.

In addition, if the CAISO develops a methodology for assessing wildfire impacts that is different from the electrical corporations' wildfire mitigation plans,⁶ the CAISO should provide stakeholders with the CAISO's methodologies, risk assessment studies, and analyses that will be used in its 2020-2021 TPP prior to the September 2020 TPP meeting. This should provide stakeholders with sufficient time to review how the CAISO's wildfire risk assessment and PSPS mitigation plans are incorporated in its TPP and its impacts on ratepayers.

2. SDG&E Area Sub-transmission Project Re-evaluation

The CAISO indicated that it plans to re-evaluate six previously-approved sub-transmission projects on the non-Bulk Electric System (BES) that have been delayed beyond 2025.⁷ The Public Advocates Office notes that this approach is consistent with the CAISO's review and cancellation of previously approved projects in PG&E's service area during the 2016-2017 TPP.⁸

The Public Advocates Office, therefore, supports the re-evaluation of SDG&E's six projects and the CAISO's decision not to model them in the 2020-2021 TPP power flow cases.

3. Storage Mapping and Resource Retirement

The CAISO indicates it plans to map generic storage⁹ to specific locations driven by the increasing role of storage in meeting greenhouse gas portfolio objectives.¹⁰ The CAISO also

⁵ On May 7, 2020, the Wildfire Safety Division of the California Public Utilities Commission issued draft resolutions that approve or conditionally approve the 2020 Wildfire Mitigation Plans submitted by each of the electrical corporations. On June 11, 2020, the California Public Utilities Commission ratified the Wildfire Safety Division's actions on all Wildfire Mitigation Plans except for Bear Valley Electric Service, which the California Public Utilities Commission will address at its future meeting.

⁶ Commission Order Instituting Rulemaking (R.) 18-10-007.

⁷ SDG&E Area Sub-transmission Project Re-evaluation, 2020-2021 Transmission Planning Process Stakeholder Meeting, June 03, 2020, slides. 23-24.

⁸ CAISO 2016-2017 Transmission Plan, March 17, 2017, slides. 3, 5, and 15.

⁹ Generic storage is the estimate of storage capacity, specifically due to the retirement of gas generation in local capacity requirement (LCR) areas.

¹⁰ Storage Mapping and Resource Retirement in Policy Assessment, 2020-2021 Transmission Planning Process Stakeholder Meeting, June 03, 2020, slide. 32.

indicated that it will utilize the California Public Utilities Commission’s recommended storage mapping to model generic storage in the TPP base cases.¹¹

The Public Advocates Office supports the CAISO’s proposed approach to map generic storage to busbar¹² and recommends that the CAISO incorporate its preliminary findings on the generic storage mapping in its September 2020 TPP stakeholders’ meeting. This should provide stakeholders with an opportunity to comment on these preliminary findings.

Conclusion

The Public Advocates Office recommends that the CAISO integrate and incorporate the electrical corporation’s authorized wildfire mitigation plans in the CAISO’s TPP wildfire risk assessment and PSPS mitigation plans, re-evaluate SDG&E’s sub-transmission projects, and integrate any storage preliminary findings¹³ in the September 2020 TPP stakeholders meeting.

If you have any questions regarding these comments, please contact Lina Khoury at either Lina.Khoury@cpuc.ca.gov or 415-703-1739.

¹¹ Storage Mapping and Resource Retirement in Policy Assessment, 2020-2021 Transmission Planning Process Stakeholder Meeting, June 03, 2020, slides. 33-35.

¹² Generic storage to busbar mapping is the installation of energy storage facilities in specific sites/locations.

¹³ Such as storage capacity and location.