# California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

**Date: 6/14/2018**

**Submitter Information**

| Organization | Contact Name | E-mail | Phone |
|---|---|---|---|
| PG&E | Tyrone Hillman,<br>Eric Eisenman | TSH0@pge.com<br>EXE3@pge.com | 415-973-3057<br>415-973-6172 |

**Please provide a title for the issue.**

Transmission Planning Process Modifications to Identify Low-Cost Reliability Solutions

**Please provide a summary description of the issue (i.e. 500 words)**

At present, CAISO generation forecasting assumptions are structured to prioritize RMR designations over other, potentially cost-effective transmission alternatives. By considering many non-RMR options only retrospectively, this process diminishes opportunity to develop the optimal planning solution at least-cost. In addition, the CAISO generation assumptions presume that RMR generators are available for dispatch up to 10 years in the future, even though their annual RMR agreements last for only a single year. This forecasting mismatch can give the CAISO the erroneous expectation that an RMR generator will remain a viable alternative into the future despite the unit's explicit request to cease operation.

This proposal may require updates to the CAISO Tariff Section 24.3.2 and any other related sections.

**Please provide any data/information available that would characterize the importance or magnitude of the issue.**

The generation assumptions currently in use prevent the CAISO from considering and developing cost-effective solutions that could simultaneously avoid costly RMR designations and improve overall grid reliability. The CAISO should modify its TPP methodologies to account for resources which are 1) at-risk of retirement, 2) may not be 40 years old, and 3) have an announced retirement. By developing a process to consider at-risk resources within the TPP, optimal solutions can be developed in a timely fashion to ensure reliability at least-cost.