



**2020-21 Transmission Planning Process**

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to engage the CAISO and provide comments on the topics discussed in the September 23<sup>rd</sup> & 24<sup>th</sup> stakeholder meeting for the 2020-21 Transmission Planning Process. PG&E’s comments can be summarized as follows:

- PG&E supports the CAISO’s efforts to evaluate 2019 wildfire information to assess potential mitigations for the 2020-21 TPP cycle.
- PG&E supports developing mitigation to the identified issues in the bulk system preliminary reliability assessment results for the northern portion of the PG&E system but recommends additional work to evaluate all the recommended actions collectively and in more detail.
- PG&E encourages the CAISO to align the TPP study criteria with the CAISO’s recent tariff revisions that update local capacity technical study criteria, resulting in reduction of gas-fired generation.

**PG&E appreciates and supports the CAISO’s efforts to evaluate 2019 wildfire information to assess potential mitigations in the PG&E service territory within 2020-21 TPP cycle.**

Overall, PG&E is supportive of CAISO’s inclusion of a wildfire risk assessment in the Transmission Planning Process. PG&E looks forward to coordinating with the CAISO on transmission system hardening and welcomes the opportunity to support CAISO’s identification of approved and potentially new projects that mitigate wildfire risk.

PG&E will continue to provide additional scenarios for CAISO analysis. When available, these additional scenarios may contain updates to the PSPS scoping criteria and methodology.

**PG&E North Bulk System Reliability Assessment**

As part of the bulk system preliminary reliability assessment results for the northern portion of the PG&E system presented at the stakeholder meeting, the CAISO has recommended to install a new RAS to bypass series capacitor(s) on the Round Mountain-Table Mountain #1 or #2 500 kV Lines to mitigate the overload caused by an outage on one of the two lines. In addition to the new RAS, the CAISO also has recommended other actions to mitigate identified thermal overload concerns in the northern portion of the PG&E system, these include adding Colusa generation tripping to California-Oregon Intertie (COI) RAS and continuing to assess Northern California hydro dispatch patterns to improve modeling (2019-2020 ISO Transmission Plan, COI Nomogram assessment for the long-term planning



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horizon). PG&E is supportive of developing mitigation to the identified potential issues, but would like to continue to work with the CAISO to evaluate all the recommended actions collectively and in further detail to ensure the impacts from the Round Mountain Reactive Support project are fully considered, to allow for the coordination with neighboring systems who are COI rights owners, and if necessary, to evaluate the economic need for the various upgrades.

**Align TPP study criteria with CAISO's recent tariff revisions.**

The CAISO undertook a two-year effort in the 2018-2019 and 2019-2020 transmission planning processes to provide a comprehensive review of the alternatives to reduce or eliminate local capacity area requirements for gas-fired generation in 22 areas and sub-areas. Subsequent to the completion of the final assessments, on December 9, 2019, the CAISO filed tariff revisions to update its local capacity technical study criteria. The tariff revisions, among other things aligned the contingencies studied in the local capacity technical study with the transmission planning studies.

The updated criteria resulted in an ~1,800 MW increase in the Greater Bay Area local requirement but this same contingency was not identified in the transmission planning process to reduce requirements for gas-fired generation. PG&E recognizes the challenges with the timing to implement the updated criteria, but it is important to reassess the alternatives along with second and/or third level constraints to reduce or eliminate the local requirements using the updated criteria.