June 20, 2023

CAISO Board of Governors
Chair Mary Leslie
Jan Schori
Severin Borenstein
Angelina Galiteva
Joe Eto

Re: Decision on Subscriber Participation Transmission Owner model

Board of Governors:

The SunZia Transmission and Wind Complex (developed by Pattern Energy and collectively referred to here as “SunZia”) includes the SunZia Transmission System and the SunZia Wind facilities. These facilities include a nominal 3GW, 552-mile, ±525kV high voltage direct current (HVDC) transmission system that will accommodate interconnection and delivery of energy produced by the 3.5GW SunZia Wind facilities. The SunZia Wind facilities are highly energetic, geographically diverse wind energy production facilities sited across three counties in central New Mexico.

SunZia applauds CAISO for the development of the Subscriber Participating Transmission Owner (sPTO) model. The sPTO model is a thoughtful and innovative approach to supporting transmission development and capturing resource diversity in the West. The sPTO model will help enable independent transmission lines to deliver significant clean energy and capacity benefits to customers in California without burdening non-subscribers—and their ultimate off-takers—with the associated transmission costs and development risk. The sPTO model also offers independent transmission developers utilizing the sPTO model, operational efficiencies and closer operational coordination with CAISO than would otherwise be possible.

SunZia looks forward to working with CAISO and other stakeholder to ensure the final CAISO Tariff language reflects the sPTO construct in a manner that provides optimal efficiencies and value to California stakeholders. SunZia strongly supports the sPTO Final Proposal and encourages Board approval today, adopting the proposal and moving forward with the updates to the CAISO Tariff and ultimately a FERC filing.

Sincerely,

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AVP, Transmission (Pattern Energy)