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SWPG appreciates the opportunity to submit comments in response to the CAISO's 2020-2021 draft Transmission Plan (plan). SWPG's comments pertain primarily to the inter-relationship between the TPP and the CPUC's IRP. SWPG encourages the CAISO to provide as much transparency and stakeholder engagement opportunity as possible for those critical inputs the CAISO provides to the CPUC's IRP – in particular, the transmission limits that constrain build out in desirable locations on the CAISO grid and/or imports from choice renewable sources outside of the CAISO grid. In this regard we offer feedback on two types of analyses/findings from the CAISO's 2020-2021 planning process and draft plan.

1) CAISO-Identified Transmission Constraints for IRP Transmission Limits

The CAISO's 2020-2021 TPP reliability studies, congestion studies and study of the CPUC's Policy Sensitivity Case 2 all seem to inform the transmission constraints used in IRP. While the CAISO's work seems mostly complete, elements of the transmission limit analysis are still underway; (e.g., footnote 114, page 212 in the draft plan says that some of this work is still underway as part of Cluster 13 assessments.) In the IRP cycle the CPUC just completed, the CPUC - in conjunction with the CAISO and CEC - used the transmission limits provided by the CAISO in 2019, and in some cases they used information derived from the CAISO's 2020-2021 TPP. The use of both the constraint data from 2019 and the new data illustrates the importance of the CAISO offering as much transparency as possible with respect to these constraints and their respective derivation.

SWPG strongly encourages the CAISO to prepare a new white paper incorporating new information regarding the transmission constraints. SWPG also requests that the CAISO offer a working group session to discuss the new white paper and that the CAISO take comments and consider any revisions warranted by stakeholders' input and questions. The vetting of this information is critical to a process that works smoothly to ensure that limitations used for analyses are agreed upon by stakeholders'. In development of the most recent CPUC 2021-2022 TPP Base Case portfolios, SWPG experienced first the inclusion of New Mexico wind based on transmission constraints and other economic data in RESOLVE, then the exclusion of New Mexico wind in Round 2 mapping– supposedly based on new transmission constraint information not released publicly, and lastly inclusion again of New Mexico wind after SWPG worked diligently to uncover the intended position of the CAISO regarding the transmission limits at Palo Verde and at Eldorado.

The lack of orderly release of the underlying data and analysis influencing the transmission limitations prevents stakeholder engagement and results in outcomes that are unpredictable. This in turn creates regulatory risk that is costly to all Californians whose LSEs are responsible for procuring zero-carbon sources. The CAISO's actions can eliminate, or at a minimum, significantly reduce this regulatory risk by fully sharing underlying constraint bases¹ and fully vetting the constraint information the CAISO intends to recommend to the CPUC.

In its draft 2020-2021 Transmission Plan, the CAISO can further work to clarify resultant findings with respect to the import constraints. Currently, SWPG has the following questions about the Riverside Palm Springs zone and the greater Southern California and Southern Nevada area.

- Since in the Southern California and Southern Nevada areas the CAISO found only two areas (Whirlwind and GLW/VEA) that needed transmission upgrades for the Policy Sensitivity Case 2, is it the case that the Riverside Palm Springs transmission capability for Energy Only resources will be increased to the level studied in the Policy Case 2?
- For deliverability purposes are the Colorado River and Devers-Red Bluff constraints shown in Table 3.9-1 on page 233 of the draft plan affected by build out in the balance of Southern California and Southern Nevada or only by build out specifically in the Riverside Palm Springs zone?
- CPUC and CAISO 2021-2022 TPP Round 2 mapping suggested that it was beneficial in some regard to rebalance by reducing Riverside Palm Springs imports even though the Riverside limit was not exceeded. Is there such a need and if so can the CAISO provide more information about this?
- Does the CAISO expect to regularly incorporate GIDAP information into the IRP process at the mapping stage? If so, how can the CAISO do so transparently and with stakeholder engagement?

2) CAISO-Proposed Process for Determining Transmission Plan Deliverability (TPD) Limits

The CAISO has articulated a methodology for establishing TPD limits in its February 9 presentation (slides 74-78) and in the draft plan (pp. 232-235). SWPG asks that the examples discussed on February 9 be posted, as the methodology is challenging to discern otherwise from the information provided.

More importantly it would seem that such a methodology should be captured in the GIDAP tariff language (Appendix DD) or in the transmission planning or Generation Interconnection BPM rather than just in this 2020-2021 plan report. SWPG encourages the CAISO to consider such an approach to provide policy review at the CAISO and among stakeholders. At a minimum the process should be captured in some policy document and thereby be readily available.

¹ SWPG recognizes that some generation interconnection and transmission planning data may warrant protection, and in these instances the data can be made available to parties through the CAISO's NDA processes and/or on a redacted basis.

SWPG understands that the CAISO prefers that the CPUC incorporate the methodology within RESOLVE such that it solves dynamically with the resource selections that RESOLVE otherwise finds optimal. However, SWPG asks the CAISO to clarify how the TPD assessments will be coordinated with the IRP cycle should the CPUC not be able to embed the methodology within RESOLVE, and requests a mechanism for transparency and stakeholder input in this event.

SWPG appreciates the CAISO's consideration of these important TPP – IRP linkages.