

2015-2016 TPP Alternate Proposal/Comments

Submitted by	Company	Date Submitted
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SolarCity appreciates the opportunity provided by the CAISO as part of the 2015-2016 Transmission Planning Process (TPP) for developers to submit alternative proposals to the ones presented in the September stakeholder meeting. We also appreciate the steps the CAISO has taken to advance the TPP by the identification and consideration of non-transmission alternatives as potential solutions to several of the reliability issues identified by the CAISO in the Southern California Edison and San Diego Gas & Electric areas. Notably, neither utility proposed solutions that included non-transmission alternatives, such as aggregations of distributed energy resources (DERs), to these reliability problems.

In light of the utility proposals, SolarCity would like to submit an alternate technical proposal to solve the reliability issues identified by the CAISO, as well as alternative proposals for line section overvoltages identified in Pacific Gas and Electric's Fresno region where DERs could be a mitigation solution. However, the information publicly supplied by the CAISO and the three investor-owned utilities (IOUs) is insufficient in scope and detail to support a quality technical proposal.

SolarCity's power system engineering team has identified the following list of technical specifications that are required at a minimum in order for SolarCity to develop a sufficiently robust technical proposal comparable to those submitted by the three IOUs. If this information is not available to potential developers, developers will be unable to supply alternate technical proposals on par with the rigor of traditional transmission infrastructure investments proposed by the three IOUs. This practically guarantees continued reliance on traditional solutions, potentially leaving significant value on the table that would otherwise be accessed were a more robust set of solutions and alternatives, including non-wires options available for consideration.

SolarCity's Suggested List of Technical Specifications

- **Project size**
Examples of this include the required MWs deferred or the required VARs to be provided.
- **Required completion date of project**

- **Operation requirements**

- Time of day
- Months required
- Speed of response required
- Duration of response
- Etc.

- **Electrical location of the project**

This would ideally include the transmission model of the area requiring the solution, but it may be sufficient to provide information regarding the surrounding grid conditions necessary to determine how to integrate the alternative solution.

- **Geographical location of the project**

This would include information regarding the region in which the solution would be provided.

- **Additional limitations or constraints that an alternative solutions would need to consider.**

Examples of this include space limitations at the substation or communication requirements.

Given the unavailability of this data, SolarCity is unable to submit a technical alternate proposal at this time, despite our desire to do so. As a starting point, SolarCity encourages the CAISO to initiate a stakeholder process to identify the types of information that third parties would need to be able to develop robust alternatives that address identified needs on the bulk power system. Such a stakeholder effort should also consider the rules governing the dissemination of that information. We look forward to the opportunity to engage the CAISO, the three IOUs, the CPUC, and other stakeholders in the future regarding ways to improve the current process to facilitate the competitive development of feasible alternative proposals developed by third-parties may be submitted in this or other future TPPs.