

CAISO Transmission Planning,

We are very appreciative of the effort put into updating the transmission capability estimates for the CPUC Integrated Resource Plan process. In separate comments to the CPUC, SCPA noted the importance of the Commission incorporating updated transmission analyses into their IRP modeling. This is especially critical given the scope of recently approved upgrades to improve the validity of an optimized statewide portfolio.

A key objective of SCPA is to promote local resource development that provides economic and reliability benefits to our community while reducing the reliance on natural gas units – many of which are in disadvantaged areas. To this end, SCPA has contracted with several North Bay battery energy storage systems, a new geothermal project, and started a strategic partnership with three companies to develop up to 600 MW of new geothermal resources near the Geysers leveraging new technologies. These resources are very reliant on North Bay transmission and deliverability to be economic and cost-effective for our ratepayers. Accordingly, we are tracking North Bay transmission constraints very closely.

All SCPA's local projects, including a battery storage system that just went through GIDAP for Cluster 13, are subject to the Delevan 500 kV constraint. The updated transmission capability estimates raise the threshold at which the Delevan constraint is encountered from 454 MW in the 2021 transmission capability whitepaper to 1,044 MW. However, this constraint is low relative to the assumptions in recent portfolios transmitted from the CPUC for the Transmission Planning Process (TPP). In the CPUC's February 2022 [Staff Report on Modeling Assumptions for the 2022-2023 Transmission Planning Process](#), it was noted that the Collinsville substation and Delevan-Cortina 230 kV reconductoring approved in the 2021-2022 TPP could enable over 2 GW of transmission capacity. Recognizing transmission headroom and reflecting commercial interest, the CPUC mapped capacity above the updated constraint proposed in this whitepaper within the Delevan 500 kV constraint and the resulting 2022-2023 TPP did not identify any required upgrades outside of a project to reduce series compensation. In developing a portfolio for the 2023-2024 TPP, the CPUC mapped a much larger set of resources subject to the Delevan constraint they acknowledged may trigger the upgrade but also forecasted smaller upgrades would likely enable a significant portion of the capacity to come online. Given the substantial cost and schedule impacts of the Delevan 500 kV upgrade and high commercial interest in the region, SCPA advocates for the CAISO to carefully consider whether smaller upgrades provide additional capacity while still working to identify the timing and need for the larger upgrade.

SCPA has similar concerns of other constraints with large-scale upgrades impacting PG&E territory including the Contra Costa to Tesla and Newark 230 kV (7-year project) and the double circuit from Vaca Dixon to Contra Costa 230 kV (12-year project). As defined, these constraints are likely to severely limit resource build-out relative to commercial interest and potentially require the CPUC to remap resources from the optimized portfolio if smaller upgrade options are deemed viable—which is not an ideal approach to identifying the optimum resource portfolio and transmission plan for the state. If smaller-scope upgrades are possible, it would be preferable to explicitly characterize those in the updated capability estimates. If the large-scale upgrades are indeed required, it's extremely important for the CAISO to start exploring solutions to accelerate their construction timeframe — a 12-year timeframe for construction will significantly impede the state's ability to deploy resources and meet its climate targets and is not an acceptable solution.

Thank you for considering this feedback.

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