

March 13, 2020

Comments of TransWest Express LLC on  
February 2020 Draft of California ISO 2020-2021 Transmission Planning Process  
Unified Planning Assumptions and Study Plan

TransWest Express LLC (“TransWest”) appreciates the opportunity to comment on the Draft 2020-2021 Transmission Planning Process (“TPP”) Unified Planning Assumptions and Study Plan (“Draft Study Plan”) prepared by the California Independent System Operator (“ISO”).

**A. Evaluation/Identification of Category 1 and Category 2 Policy-Driven Transmission Solutions**

TransWest recommends that Section 3 of the Draft Study Plan be amended to include Slide 5 of the presentation from the stakeholder meeting, entitled “Key objectives of the policy-driven assessment in the 2020-2021 TPP.” These key objectives include:

1. Study the transmission impacts of the base and sensitivity portfolios transmitted to the CAISO by CPUC
2. Evaluate transmission solutions (Category 1 and Category 2) needed to meet state, municipal, county or federal policy requirements or directives
3. Test the CAISO-provided transmission capability estimates used in CPUC’s integrated resource planning (IRP) process and provide recommendations for the next cycle of portfolio creation
4. Support and test the framework based on CPUC-provided objectives for siting generic storage selected in CPUC IRP process

These key objectives - study impacts, evaluate solutions, test capacity estimates and support the CPUC IRP process - are all reasonable and should be included in the Draft Study Plan to articulate clearly the goals and assumptions for the various public policy and technical studies in Phase 2.

## **B. Relationship between the policy-driven analysis for the base case portfolio and the sensitivity portfolios**

TransWest recommends the ISO update the Draft Study Plan to clearly articulate the relationship between the policy-driven analysis for the base case portfolio and the sensitivity portfolios, and the evaluation/identification of Category 1 or Category 2 policy-driven solutions. TransWest believes the simplest relationship between the portfolios and the transmission solution criteria is as follows:

### Category 1 policy-driven transmission solutions:

- a.) Identified in the TPP policy-driven assessment of the “base” portfolio as needed,
- b.) Verification that the approximate or representative cost of the identified transmission solution was included within the CPUC RESOLVE model used to develop the optimal “base” portfolio provided by the CPUC, and
- c.) Determination that other TPP Category 1 criteria contained Section 24.4.6.6. are met.

### Category 2 policy-driven solutions:

- a.) Identified in the TPP policy-driven assessment of the “base” portfolio as needed but either not included in the CPUC RESOLVE model used to develop the “base” portfolio or falls short of meeting other criteria in Section 24.4.6.6, or
- b.) Identified in the TPP policy-driven assessment of one or more of the “sensitivity” portfolios as needed.<sup>1</sup>

The TransWest Express Transmission Project (“TWE Project”), is an example of the potential Category 2 transmission projects that should be evaluated in Phase 2.

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<sup>1</sup> The incremental transmission “need” associated with the “sensitivity” portfolios should be considered as conditional need consistent with the CPUC Proposed Decision, Finding of Fact #23.