



2/24/2021

California Independent System Operator
250 Outcropping Way, Folsom, CA 95630

CAISO Transmission Planning:

Vistra Corp. respectfully submits these comments in response to the CAISO's 2020-2021 Transmission Planning Process ("TPP") Draft Plan posted on February 1, 2021 and discussed at a public stakeholder call on February 9, 2021. The production cost model simulation ("PCM") that informs both the policy and economic assessments is a critical tool to identify solutions needed to ensure the transmission system can reliably support the development of renewable integration resources (batteries) in areas that have commercial viability. In our prior comments, Vistra detailed specific considerations for improving the modelling inputs or assumptions to better model thermal limits consistent with expected operations or recognize various dispatch assumptions based on how storage assets operate. We look forward to introducing those comments into the new TPP cycle for 2021-2022. In these comments, we would like to confirm our understanding of the role of the battery remapping sensitivity in the PCM:

- Please confirm the battery remapping did not resolve any transmission issues that would otherwise have led to a policy-driven transmission need being identified in this plan.
- Please confirm commercial viability or economic benefits were not considered in the battery remapping.
- Please confirm the CAISO intends for the remapped battery MW in Table 3.8-2 to inform non-transmission alternatives and clarify whether CAISO is considering approving those in future cycles.
- Section 3.8 describes the remapping approach as, "the battery storage that was found to be undeliverable in the on-peak deliverability assessment was relocated". We observe "Mosslanding" had all the battery storage at that bus reduced even though Moss Landing – Las Aguilas 230kV line was not included in the on-peak deliverability assessment results. Please clarify how this bus was selected for remapping and why the full amount of batteries was reduced at that bus.
- Please confirm this battery remapping sensitivity is planned to be included in future TPP cycles.

Sincerely,

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