



# WESTLANDS

---

## SOLAR PARK

### **Westlands Solar Park Comments on California Independent System Operator's 2020-2021 Transmission Planning Process - June 3<sup>rd</sup> Meeting**

The Westlands Solar Park (WSP) appreciates the opportunity to provide these comments on the California Independent System Operator's 2020-21 Transmission Planning Process. This TPP cycle promises to be one of the most influential yet, as storage begins to enter a more dominant position in the generation fleet and transmission planning. WSP believes more transmission and storage solutions are needed to address increasing levels of curtailment, and we were encouraged that CAISO is giving careful consideration to solutions to mitigate excessive curtailment.

During CAISO's June 3<sup>rd</sup> presentation of storage mapping and resource retirement in the policy assessment, CAISO noted that "specific renewable zones of interest" will be studied for storage and transmission solutions to high levels of curtailment.<sup>1</sup> It is unclear to WSP how CAISO will determine the interest in these zones and ultimately select areas for these curtailment studies, but WSP requests that CAISO consider studying the Westlands area for storage and transmission solutions to high renewable curtailment.

While the Westlands area has a demonstrated potential for significant solar plus storage development, CAISO's TPP has shown curtailment to be an issue in the Westlands area. In the 2019-20 Transmission Plan, the PG&E Westland-Fresno-Kern area was one of the most curtailed areas in the Sensitivity 1 and 2 results.<sup>2</sup> This was true with or without the net export limit, unlike some areas of heavy renewable curtailment. The curtailment noted in the 2019-20 TP is likely to persist or increase in the 2020-21 TPP because the CPUC's sensitivity modeling assumptions include significant solar in the Westlands area while apparently still underrepresenting the commercial interest in the area.<sup>3</sup>

Again, WSP requests that CAISO consider studying the Westlands area for storage and transmission solutions to high levels of renewable curtailment as part of its policy-driven

---

<sup>1</sup> See CAISO's 2020-21 TPP June 3, 2020 meeting, slide 9 of the "Storage mapping and resource retirement in policy assessment" (PDF p. 38): <http://www.caiso.com/Documents/Presentation-2020-2021TransmissionPlanningProcess-Jun032020.pdf>.

<sup>2</sup> CAISO's 2019-2020 Transmission Plan, Board approved March 25, 2020, pp. 198-203: <http://www.caiso.com/Documents/ISOBoardApproved-2019-2020TransmissionPlan.pdf>.

<sup>3</sup> CPUC Staff Report: Modeling Assumptions for the 2020-2021 Transmission Planning Process Release 2 (TPP Sensitivity Portfolios), March 30, 2020, pp. 22-24: [ftp://ftp.cpuc.ca.gov/energy/modeling/Modeling\\_Assumptions\\_2020\\_2021\\_TPP-Report-Release2.pdf](ftp://ftp.cpuc.ca.gov/energy/modeling/Modeling_Assumptions_2020_2021_TPP-Report-Release2.pdf).

studies discussed on the June 3<sup>rd</sup> TPP call. Thank you for your consideration of these comments.

Daniel Kim  
VP - Regulatory and Governmental Affairs  
Westlands Solar Park  
Phone: (916) 709-9289  
Email: [dan@westlandssolarpark.com](mailto:dan@westlandssolarpark.com)