



CALIFORNIA COMMUNITY CHOICE ASSOCIATION
COMMENTS TO THE SUBSCRIBER PARTICIPATING TO MODEL STATUS UPDATE
December 19, 2022

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator's (CAISO's) Subscriber Participating Transmission Owner (SPTO) model presented on December 5, 2022. CalCCA supports enhancing California's ability to access out-of-state renewable resources through the development of new transmission. Transmission availability is a critical contributing factor load-serving entities (LSEs) consider when making decisions to procure out-of-state resources. An alternative model for developing new transmission in the CAISO system will provide additional opportunities for LSEs to access out-of-state resources.

The December 5, 2022, stakeholder call helped clarify a number of questions related to how existing CAISO processes will interact with the SPTO model. These clarifications include:

1. That LSEs will be allocated Maximum Import Capability (MIC) at the new import points and resources interconnected to the new transmission project will be within the CAISO balancing authority areas (BAA), and therefore not require MIC; and
2. That Congestion Revenue Rights (CRRs) will be made available on the line through the normal CRR allocation process.

Additional clarifications are necessary, however, before CalCCA can fully support the SPTO model as presented. The December 5, 2022 presentation indicates that TransWest will not be able to add future subscribers.¹ Given this, the CAISO should clarify whether the subscriptions will end after some point in time or extend in perpetuity. If the subscriptions end after some point in time, the CAISO must clarify how costs of the transmission line will be recovered after the end of the subscriptions. For example, can TransWest Express get new subscribers after the existing subscriptions expire? Can the existing subscriptions be extended or transferred? If not, how will foregoing costs be recovered? CalCCA requests that the CAISO clarify what happens to the costs of projects using the SPTO model after encumbrances end. The answers to these questions are important because they will impact both how future ongoing transmission costs associated with the project will be recovered and how access to the transmission will be made available to market participants.

¹ *Subscriber Participating TO Model Status Update (Dec. 5, 2022)* at 12:
<http://www.caiso.com/Documents/Presentation-Subscriber-Participating-Owner-Status-Update-Dec-5-2022.pdf>.