



Comments of American Clean Power – California (ACP-California) on the July 29, 2022 Transmission Development Forum

August 12, 2022

Introduction

ACP-California greatly appreciates the work that the California Independent System Operator (CAISO), the California Public Utilities Commission (CPUC) and the Participating Transmission Owners (PTOs) have put into organizing and holding the ongoing Transmission Development Forums. For some time, ACP-California has been raising concerns around, and brainstorming solutions to, the delays that have been occurring to the permitting and construction of transmission facilities necessary to enable new clean generation resources to come online and support Resource Adequacy (RA) requirements. The Transmission Development Forums, and associated spreadsheets and data points provided for these meetings, are an important venue for generation developers to understand the status of upgrades that may affect them, bringing transparency to the process and timelines for projects approved in the Transmission Planning Process (TPP) or included in a signed Large Generator Interconnection Agreement (LGIA). ACP-California supports the continuation of these forums for the foreseeable future, as we collectively seek solutions to the delays in the transmission development process.

ACP-California appreciated the updates given by the PTOs at the July 29, 2022 Transmission Development Forum regarding the status of transmission projects, particularly the information about, and reasons for, project delays. The July forum, and previous forums, have helped to increase transparency around transmission development efforts, as stakeholders receive timely updates on the potential for project delays and, in many cases, the reasons for those delays. This information can be helpful in determining whether there are solutions to mitigate delays. And addressing delays is imperative as completion of these upgrades and expansion projects is critical to near-term reliability and long-term decarbonization of the grid. For these reasons and more, the forums should be continued.

Below, we provide some suggestions for continued improvement in the information provided at the Transmission Development Forums.

Additional Transparency and Information would be Useful in the Future

While the information provided during the Transmission Development Forums has been very useful, and we appreciate the incorporation of some of our initial suggestions from comment on the first forum, ACP-California continues to support additional transparency around the how transmission projects are prioritized and sequenced by the PTOs. Providing more information



on the process used for prioritization of individual projects may help stakeholders better understand the reasons for project delays. That, in turn, will allow solutions for delays to be evaluated and brought forward.

ACP-California also reiterates its request that, as part of the Transmission Development Forum spreadsheets, PTOs report on the capacity (MW) of resources in the queue which are dependent on the relevant transmission upgrade/project and whether those resources require the project to interconnect or to achieve deliverability. More granular information on the generation projects that are dependent on these upgrades (without providing project-specific information) would also be incredibly useful. And this information may also help generators better understand the prioritization of individual projects by the PTOs.

Conclusion

ACP-California reiterates its support for the Transmission Development Forums, and especially thanks CAISO, the CPUC, and the PTOs for the work put into these to make them successful. We appreciate the opportunity to provide comment, and look forward to further dialogue in the future as we identify the most critical upgrades and enable new capacity to support RA requirements and overall reliability of the system.