



Stakeholder Comments
2015-2016 TPP Stakeholder Meeting
September 21-22, 2015

Submitted by	Company	Date Submitted
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CESA appreciates the opportunity to comment on the 2015-2016 Transmission Planning Process ("TPP") September stakeholder meeting.

The 2015-2016 TPP has forged new ground via its consideration of new grid resources and non-transmission resources in the TPP. CESA applauds the CAISO for looking at non-transmission alternatives as potential solutions to several of the reliability issues the CAISO identified in Southern California Edison and San Diego Gas & Electric territories.

CESA recognizes that the true test of non-wires alternatives being treated on a level playing field with traditional wires solutions will be when the IOUs or third parties actually propose a non-wires project as the preferred solution. While CESA was disappointed that neither SCE nor SDG&E proposed new or distributed storage as an alternative to new transmission infrastructure, the fact that non-wires alternatives are part of the discussion is a step in the right direction.

Many challenges remain for storage to be fairly evaluated. The most critical barrier remains for the ISO and the CPUC to develop a methodology to enable partial rate recovery – or some other form of market-based value to be delivered to such DERs – when DERs provide reliability benefits. Recognizing the interplay between CAISO, FERC, and CPUC rules in resolving these barriers, CESA suggests ongoing collaboration on benefits and the provision of services in DRP and IDSR proceedings at the CPUC.

CESA hopes that non-wires alternatives will be proposed as preferred solutions by IOUs in the next TPP cycle – or by third party developers in the current cycle – so that stakeholders will have an opportunity to gain insight into how such non-wires alternatives will be compared to traditional wires solutions when selecting preferred alternatives. Regardless of whether a non-wires solution emerges as the preferred solution to a reliability issue in the 2015-2016 TPP cycle, a key CAISO goal should be to continually improve transparency around how non-wires alternatives are considered in the TPP.

We appreciate CAISO's consideration of CESA's comments and look forward to ongoing participation in the CAISO's Transmission Planning Process.