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## Comments to CAISO's 2020-21 TPP Study Plan

EDF Renewables (EDFR) appreciates the opportunity to comment on the CAISO's 2020-2021 Transmission plan and we appreciate the effort that CAISO has invested in developing a robust transmission planning process over the past years. The CAISO resource mix and the resource mix of neighboring Balancing Authorities in the WECC has been changing rapidly as reflected by the recent updates to the CPUC IERP plans. It is a challenging yet exciting time in the industry, but it is also very evident that comprehensive transmission planning is significant to a successful transition to CA SB100 goals. As a market participant with key interest in CAISO through existing resources, resources in construction, and planned resources we have several comments to the CAISO 2020-2021 Transmission planning process. The comments focus on the following areas:

- Near term economic model development (2-5 year horizon)
- Frequency of Stakeholder Process
- 2000MW Net Export Limit
- The CAISO should provide a mapping of new generation in the models

1. **Near term economic model development (2-5 year horizon):** Given the large resource transition that CAISO has experienced, EDFR feels strongly that CAISO should be evaluating economic transmission constraints on a near-term basis, such as 2-5 years out. In doing so CAISO would be better suited to address underlying economic constraints that may arise from the proposed Deliverability Methodology and understand the Benefit/Cost tradeoff between new infrastructure and congestion and curtailment costs. A near-term model is reflective of status quo. By having a near term economic model CAISO and its members will have a better understanding of the impacts due to the current resource transition and be able to identify transmission issues that may require a more near-term solution. Failure to identify and address areas of high congestion and curtailment as they develop will negatively impact the development of new resources as well as cause customers to bear increased costs of unmitigated market constraints.
2. **Frequency of the Stakeholder Process:** The current process has limited stakeholder involvement during the planning study; therefore, CAISO should consider holding additional stakeholder meetings between now and September 2020 to share preliminary results and



issues, respond to stakeholder comments, and request additional feedback on potential solutions. This could possibly happen in Mid-Late April after the initial project screening and model development has been completed. Such approach is the norm in most if not all other Independent System Operator (ISO) markets.

- a. **Transmission Solutions Adjustments window:** Currently transmission solutions are submitted prior to identifying system constraints and issues, this leads to ineffective solutions because transmission developers are not able to validate and test their proposals in the models that will be used. CAISO should publish an identified list of transmission needs for which proposals will be sought. At minimum, CAISO should allow stakeholders a review window to revise proposals based on identified needs. This procedural change would result in much better results.
  - b. **Transmission Model Review:** CAISO should make the transmission models available for review and analysis prior to a revision window for the proposed transmission solution ideas. Ideally this would be after the initial screening to allow stakeholders to review their proposals with the study model and modify their proposals to address perceived shortcomings.
3. **2000MW Net Export Limit:** In the 2019-2020 planning study results the CAISO made a significant point to show the results of system curtailment with and without the net export limit applied. However, it is not explained in either the 2019-2020 draft report or the 2020-2021 system plan the significance of the is limitation, if it will be implemented, why it is implemented, and specifically the analysis that the CAISO uses to determine why 2000MW is the appropriate limit to use. *Can CAISO explain within the 2020-2021 TPP study plan or via a white paper address the use of this limit in their transmission plan?* Additionally, if policy initiatives such as the Extended DA market would affect the use of this limit it would be appreciated if CAISO could clarify how the export limit would change.
  4. **CAISO should provide a mapping of new generation in the models:** In order to ensure that stakeholders are understanding the buildout used in the transmission plans CAISO should clarify how CAISO planning regions and the CEC resource mapping regions overlap and clearly identifying these resources in the models. Currently it is very difficult to determine the relationships between CEC resource zones and CAISO planning zones. As with the other points above, sharing the siting plan of future resources for stakeholders 'review and feedback is a standard practice in other ISOs.