

May 10th, 2022

Comments—Transmission Development Forum (April 26th, 2022):

Introduction:

EDPR appreciates the opportunity to comment in response to the April 26th Transmission Development Forum and, more generally, the effort the CAISO, the CPUC, and the Transmission Owners have put into this new and evolving forum. Receiving timely information about important transmission and interconnection upgrades allows EDPR to more efficiently commission our renewable energy and storage projects and contribute to California's clean energy and resource adequacy needs in a timely manner.

EDPR has one technical question following up on the April 26th discussions and some general comments to increase the benefits of the forum moving forward.

Technical Question:

With respect to the Gates breaker over-duty issues, the breakers are currently rated at 40kA—prior to the breaker replacement in Q1-2023, what is the breaker duty for each CB 352, 362, 372 (% of 40k)? Even a rough estimate would be helpful/appreciated.

General Comments:

- 1) Increasing the consistency of the information provided and the presentation/format of the information across the Transmission Owners will make it easier for stakeholders and decision makers to find and process the specific information they need.
- 2) Providing the “original estimated in-service date” for each project is useful for understanding how long certain types of transmission and interconnection projects generally take to complete and evolving trends in this regard. It also could help to highlight barriers to transmission development that may exist and should be useful for both stakeholders and policy makers considering policy changes in this space.
- 3) Providing an estimate of the amount and timing of the Resource Adequacy that could be enabled by a given transmission project would help to prioritize scarce engineering and construction resources. Obviously, the timing of the transmission upgrade itself determines the timing of the Resource Adequacy, but including information about the relevant generators' Commercial Operation Dates and deliverability status would provide a sense of whether the transmission project is a commercial bottleneck for supplying resource adequacy over the next

2-3 years, or not. This information could be useful even at a high-level, aggregated and anonymous.

Thank you again for the opportunity to comment.

Sincerely,

Cameron Yourkowski

Cameron.yourkowski@edpr.com

EDP Renewables North America LLC

Regulatory and Market Affairs Manager – Western Region