

**Comments of GridLiance West LLC on
CAISO's 2019-2020 Transmission Planning Process Meeting on 2/7/20**

February 21, 2020

GridLiance West LLC (GLW) appreciates the opportunity to comment on the stakeholder meeting held on February 7, 2020, regarding CAISO's Draft Transmission Plan for the 2019-2020 Transmission Planning Process (TPP). GLW appreciates the detailed presentation that CAISO prepared for this stakeholder meeting and references specific slides from that presentation in these comments.

Request for Clarification of Use of Curtailment to Mitigate P0 Events in Policy Assessment

GLW would appreciate if CAISO clarified some of what was presented regarding the 2019-2020 TPP Policy-Driven Assessment. Specifically, slide 18 of Mr. Barave's presentation states that the use of "modest renewable curtailment (30 to 150 MW) will mitigate these issues" on the GLW/VEA transmission system. The application of curtailment of renewable generation for a base case event in a policy study seeking to deliver renewable generation at levels determined appropriate by the CPUC to CAISO rate payers appears out of step with the purpose of the policy assessment. Additionally, while the use of RAS and congestion management for P1+ events is allowable under CAISO processes, GLW questions whether this approach will result in the best outcome for California consumers. The benefit of more cost-effective renewable generation in the GLW/VEA area fully deliverable to CAISO rate payers will significantly exceed the cost of transmission upgrades in the GLW/VEA area.

Request for Clarification of the Need to Mitigate Impacts to Affected Systems in Economic Assessment

GLW would appreciate if CAISO clarified the need to consider Affected Systems in its Economic Project Assessments. Specifically, the CAISO added, as an Alternative 2 to GLW's Economic Project submission, phase shifters to "help limit the loop flow between the NVE and CAISO systems" based on CAISO prior interconnection studies.¹ The adjustments the CAISO made to the project adversely affected the Economic Benefits measured by more than 50%. GLW seeks clarification regarding the obligation of the CAISO to minimize impacts on neighboring systems, especially when doing so harms the CAISO and potentially harms the overall WECC benefits.

Request for Clarification of the Deliverability Values for Southern California

The CAISO provided in its draft report Table 3.8-1 showing Deliverability Area Constraints in Southern California. In this table the CAISO indicates a deliverability value of 790 MWs for GLW. In the prior IRP cycle the CAISO provided a limit of 802 MWs to the CPUC for the GLW/VEA area. GLW requests that the CAISO clarify its proposed value of 790 MWs, in particular indicating the basis for the reduction. GLW further seeks clarification as to whether this 790 MW proposed value is based on the pre-existing generation interconnection study methodology or the impending revised generation interconnection study methodology?

¹¹ TPP Draft Plan, p. 279.
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Request for CAISO Consideration of Increased Energy-Only IRP Limit for IRP

The Draft TPP report suggests that the GLW/VEA area congestion associated with the base portfolio is relatively minimal as compared with the congestion in other subareas constrained within IRP. Table 3.6 -1 shows that the congestion in the GLW/VEA area is approximately \$5M per year for the 2000 MW per year in the export limited case. This modest level of congestion suggests that GLW/VEA could support at least some of level of additional Energy-Only resources. Based upon the CAISO's analysis in this 2019/2020 TPP, GLW encourages the CAISO to offer a non-zero Energy Only limit to the CPUC for its next IRP cycle.

We appreciate CAISO's consideration of these items.

Sincerely yours,

A handwritten signature in black ink that reads "Jody Holland". The signature is written in a cursive, flowing style.

Jody Holland
Vice President, Transmission Planning