

March 14, 2018

Gridliance West Transco (GWT) appreciates the opportunity to submit comments on the 2018-2019 Transmission Planning Process Draft Study Plan. We commend the CAISO draft plan for addressing both the California's mandate for 50% renewable energy and greenhouse gas (GHG) reduction by 2030 as described in Senate Bill (SB) 350. However, GWT encourages the CAISO to act more quickly than outlined in the Draft Study Plan in two respects. First, while we understand there are reasons for not driving any policy projects out of the 2018-19 TPP, there should be some consideration to projects that have already been studied and offer strong potential to meeting CAISO reliability needs yet have been waiting on policy guidance. Additionally, the ISO should take policy objectives into consideration when there are identified reliability and economic benefits; any project with sufficient multi-pronged benefits should be approved in this TPP cycle.

GWT has a strong 230 kV grid that can be leveraged to maximize reliability and generation deliverability, provide low cost interconnections, and minimize curtailment of a balanced portfolio of renewable resources that can be connected to the only portion of the CAISO transmission system located outside of California. GWT transmission facilities are located in a renewable rich area of the CAISO system that currently is free from relying on Remedial Action Schemes to address issues on the GWT transmission system. Currently the GWT system supports minimal renewable generation. However, there is significant activity in the generation interconnection process and the potential is high for development of a balanced portfolio of low cost renewable resources. The CPUC's 42MMT case shows over 3000 MWs of solar renewable energy in the vicinity of GWT's service area.

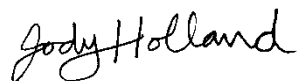
GWT also resubmits earlier comments that are very pertinent to the public policy objectives in the 2018-19 TPP, as follows.

The Western Interconnect is unique in that it relies heavily on Remedial Action Schemes as long-term solutions to address transmission constraints and reliability issues. Our experience in the Eastern Interconnect and ERCOT points to the use of Remedial Action Schemes as short-term solutions to bridge to long-term reliable resilient transmission solutions. While we understand the rationale and the development for Remedial Action Schemes in the West to address generation that is remote from load centers, the move to renewable types of generation resources demands a change in thought and application of Remedial Action Schemes to a more proactive recognition that reliability and resiliency of

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the grid requires further transmission development. GWT believes that the long-term benefits of transmission are discounted in many situations for the short-term cost benefit of Remedial Action Schemes. The cost of avoiding future Remedial Action Schemes over the life of a line as well as reliability and resiliency benefits along with market flexibility provide for lower cost generation solutions. These quantifiable benefits provide value to customers within CAISO and should be factored into the calculation of costs when considering installation of a Remedial Action Scheme versus the investment in new transmission infrastructure. For these reasons we believe CAISO should focus first on long-term robust transmission solutions that bring value to CAISO.

Sincerely yours,



Jody Holland
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