

October 5, 2018

GridLiance West LLC (GLW) appreciates the opportunity to submit comments on the public stakeholder meeting held on September 20 and 21 regarding the CAISO Transmission Planning Process. GLW 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.

GLW transmission facilities are located in a renewable rich area of the CAISO system that currently has no functional Remedial Action Schemes that address issues on the GLW transmission system. Currently, the GLW 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 in the range of 2500 to 3000 MW. The Western Interconnection 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 Interconnection 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 the grid requires further transmission development.

GLW continues to believe 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 provides 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.