

The ISO received comments on the topics discussed at the October 28, 2022 stakeholder meeting from the following:

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Copies of the comments submitted are located on the User Groups and Reoccurring Meetings Page under Transmission Development Forum at:

<https://www.caiso.com/informed/Pages/MeetingsEvents/UserGroupsRecurringMeetings/Default.aspx>

The following are the ISO and PTO’s responses to the comments.

1. California Public Utilities Commission - Public Advocates Office		
No	Comment Submitted	CAISO Response
a	<p>The Need for Severely Delayed Transmission Projects Should be Re-Evaluated During the TDF, PG&E provided status updates and information on project delays for 48 of its CAISO-approved transmission projects. These projects are only the tip of the iceberg. As PG&E explained, the subset of projects discussed are those with recent project schedule updates. As noted in the TDF workbook, PG&E has a total of 83 CAISO approved transmission projects that are delayed or pending operational status. This is in stark contrast to SCE and SDG&E that have only 13 and 14 pending projects, respectively. One of PG&E's severely delayed projects, the Metcalf-Piercy & Swift and Newark-Dixon Landing 115 kV Upgrade, was approved by CAISO nearly 20 years ago, in 2003. Indeed, PG&E has 7 delayed projects that were approved before 2010 and 13 projects that were approved prior to the 2011 TPP.</p> <p>It is critical that CAISO scrutinize the need for previously approved transmission projects that are severely delayed. If a project was found to be necessary by CAISO 20 years ago but is still not built and isn't scheduled to be built for another 4 years, it is imperative that CAISO determine if the same system conditions exist today as at the time of approval. Ratepayers should not be burdened with funding transmission projects that have become unnecessary or obsolete given the length of time and changes to the grid that have transpired. Cal Advocates recommends that CAISO re-evaluate the need for PG&E's 13 severely delayed projects that were approved prior to the 2011 TPP. If CAISO finds that the need for these projects has diminished, these projects should be eliminated. This critical analysis could provide necessary ratepayer relief and reduce PG&E's unacceptable backlog of transmission projects.</p>	<p>The assessment of need for facilities is not a part of the scope of the transmission development forum. This question is applicable to the CAISO's transmission planning process. The CAISO has in past reviewed the need of various approved transmission projects within the CAISO's annual transmission planning process and is done on a case by case based if there are changes to the drivers for the need for the project.</p>
b	<p>Severely Delayed Transmission Projects Should be Subject to Competitive Bidding</p> <p>It is critical, given the urgency of the climate crisis and California's efforts to both maintain reliability and transition its energy sector to zero-carbon resources, that transmission projects not be unnecessarily delayed. To address PG&E's huge backlog of CAISO-approved transmission projects, CAISO should enlist the competitive market to help alleviate the problem. Specifically, projects that the CAISO has deemed necessary, but which are severely delayed should be subject to competitive bidding by non-incumbent transmission developers. This approach would help reduce PG&E's backlog of projects and could provide</p>	<p>This is outside the scope of the transmission development forum. The approval of the transmission projects are done within the scope of the CAISO's transmission planning process or through the CAISO's generation interconnection process per the requirements of the CAISO's tariff.</p>



	<p>cost savings to consumers as the Brattle Group reports that competitive processes have yielded savings averaging 30% below the incumbent utility transmission project cost.</p>	
<p>c</p>	<p>The TDF Workbook Should be Enhanced CAISO should enhance the transparency and usability of the TDF workbook as follows:</p> <ol style="list-style-type: none"> 1. Provide a column that specifies whether the transmission project is a Reliability, Policy, or Economic project. This will convey important information regarding the purpose and urgency of a project and whether there are California policy goals or ratepayer cost benefits at stake. 2. Require all PTOs to use standardized language for reporting “project status” and use standardized columns. This change will help transparency and usability and comparisons between PTOs. 3. Provide a standardized definition of terms used in the TDF workbook. 	<p>The CAISO will include this information in the tables in the Draft 2022-2023 Transmission Plan that will be posted March 31, 2023 and in the subsequent TDF workbooks starting in April.</p> <p>The CAISO is continuing to work to enhance consistency between the PTOs.</p>

2. EDPR		
No	Comment Submitted	CAISO/PG&E Response
a	Phase 4 of the Circuit Breaker work at the Kern substation has been delayed (“reprioritized”) by two years, from 2025 to 2027. This new timeline would equally delay significant amounts of resource adequacy from reaching market in 2005. EDPR greatly appreciates more information on the drivers of these delays and any options for moving the timeline back to the 2025 ISD.	<p>As conveyed at the October TDF, some projects are being delayed due to work reprioritization. PG&E is taking steps to ensure its workplan addresses highest priority safety work while managing overall costs. Inflation and supply chain impacts have increased the overall costs to execute PG&E’s 2022 workplan relative to expectations earlier this year. PG&E will continue to coordinate with the CAISO on TPP approved projects and with other stakeholders via the TDF forum.</p> <p>In addition, PG&E is looking into other options and will communicate to affected customers if any options are identified to improve upon the ISD dates.</p>
b	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. For reference, please see project ID # C12P2-PNU-02.	This information is accessible via the area reports and reassessment reports posted on the CAISO Market Participant Portal.

3. Falcon Energy Storage Holdings II		
No	Comment Submitted	CAISO/PG&E Response
a	<p>Could PG&E provide more detail on the internal decision-making process affecting how certain PNUs are reprioritized? How does PG&E ensure that Interconnection Customers are not harmed by reprioritizing certain PNUs required for one project over the PNUs required by another project? Does PG&E consider queue priority of interconnection customers in making prioritization decisions? Many PNUs that are being reprioritized are included in executed LGIAs. Does PG&E take this into consideration when determining what work to reprioritize? For example, Palo Alto 115kV circuit breakers 412 and 442 in-service dates were delayed by several years as part of the August 2022 CAISO Reassessment and now TDF. This upgrade is required for several advanced projects that are viable Mid-Term Reliability solutions, thus jeopardizing reliability in the state. A three-year delay to this PNU without explanation or justification is unacceptable. Can PG&E explain?</p>	<p>As conveyed at the the October TDF, some projects are being delayed due to work reprioritization. PG&E is taking steps to ensure its workplan addresses highest priority safety work while managing overall costs. Inflation and supply chain impacts have increased the overall costs to execute PG&E's 2022 workplan relative to expectations earlier this year. PG&E will continue to coordinate with the CAISO on TPP approved projects and with other stakeholders via the TDF forum.</p>
b	<p>ACP-California requested in their comments to the July 29th TDF that PG&E provide more detail on how transmission projects are prioritized and sequenced by the PTOs. CAISO confirmed that this information would be provided in future TDF spreadsheets and presentations. As requested previously by ACP-California and now by Falcon, could PG&E please update their comments in the slide deck titled "PG&E Projects Status Summary" with an explanation on the rationale for reprioritization and sequencing rather than just the comment "Q4 Notes: Work reprioritization"?</p>	<p>PG&E appreciates Falcon Energy Storage Holding's request and has taken steps to include a column describing the status of projects. At the October TDF, PG&E conveyed that some projects are being delayed due to work reprioritization and provided context for the actions being taken.</p>
c	<p>On the TDF call, PG&E noted that some of the reprioritization is due to simply having too much work. If this is the case, can CAISO facilitate a process that would allow Interconnection Customers to perform this work on behalf of PG&E to ensure projects come online in a timely manner to meet reliability needs and contractual obligations? Falcon, for one, is open to using PG&E-qualified subcontractors such that the work would be completed meeting all applicable utility standards and requirements, yet could be expedited to resolve the delays that PG&E itself is experiencing.</p>	<p>For clarity, the reprioritization of some work by PG&E is not due to simply having too much work. Rather, PG&E is reprioritizing some work to ensure its workplan focuses on the highest priority safety work while managing overall costs.</p> <p>As noted similarly above, PG&E is currently evaluating other options and will communicate to affected customers if any options are identified to improve upon the ISD dates.</p>
	<p>PG&E's delays to PNUs are significantly affecting generator commercial operation dates under executed LGIAs. In order to allow some impacted generators to come online in the interim, can CAISO and PG&E accelerate a customer's ability to perform limited or interim operational studies? Currently,</p>	<p>The CAISO has guidelines for requesting a limited operation study in its Generation Management Business Practice Manual, Section 8. An</p>



<p>customers cannot undertake these studies until 6 months prior to operations, which is unworkable because generators cannot get within 6 months of commercial operation (and achieve necessary financing) when their upgrades are substantially delayed.</p>	<p>Interconnection Customer can attempt to request a Material Modification to phase their project to potentially limit the impacts.</p>
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