



November 30, 2016

Submitted to the CAISO at regionaltransmission@CAISO.com by Danielle Mills (Senior Policy Advisor) and Susan Schneider (Consultant)

RE: Comments of the Large-scale Solar Association on the Materials and Discussion for the November 16th Transmission Planning Process Stakeholder Meeting

The Large-scale Solar Association (LSA) hereby submits these comments about several topics in the presentation materials and related discussion at the November 16th Transmission Planning Process (TPP) stakeholder meeting (Meeting). LSA's comments address three issues – two related to the 50% RPS Special Study and one related to potential cancellation of a large transmission project.

50% RPS Special Study – use of study findings to expedite transmission development

LSA is concerned generally that, long after the California legislature adopted the 50% Renewables Portfolio Standard (RPS) by 2030, the CAISO is still using the 33% RPS for its main studies. Based on the discussion at the Meeting, it seems possible that this situation may persist until the 2019-2020 TPP.

If that happens, new transmission to meet the higher RPS would not be approved by the CAISO until well into 2020 or even 2021 (especially with a possible competitive solicitation process). These projects would be unlikely to be on-line until the mid- or late 2020s, when the state is supposed to be close to meeting its 50% RPS obligation.

LSA understands the need for additional work to craft 50% RPS portfolios for use in the main TPP studies. However, the 50% RPS Study in the last planning cycle clearly identified some areas where transmission congestion and renewables curtailment could be a strong concern.

The TPP Study Plan for this cycle, which states (on p.50) that one objective of this study would be to “anticipate potential transmission needs to meet the 50% renewable energy goal.” This objective is stated in relation to comparing transmission needed for Energy-Only vs. Full Capacity status for the generation procured above 33% RPS to meet the 50% RPS target. However, given the long lead-time for development of new transmission, it would be prudent for the CAISO to use the Energy-Only scenarios in this study to make at least a preliminary evaluation of any new transmission that might be needed to address these problems.

The CAISO should consider asking the PTOs to begin at least some low-cost, preliminary development work on upgrades that look to be highly likely to be needed under these scenarios, even though definitive recommendations and approvals may not be issued until later planning cycles. That would reduce the lead time needed to move these projects forward once the 50% RPS portfolios are finalized and the need for the transmission can be confirmed.

50% RPS Special Study

The CAISO stated that the results and details for the Special Studies may not be included in the January draft transmission plan. The CAISO may issue preliminary results at the February stakeholder meeting, but final details and final results may not be available to stakeholders until the Draft Final Proposal (which goes to the Board) is issued in March.

The TPP is designed as a transparent process that allows stakeholders to offer input to the CAISO, with time for the CAISO to consider that input and use it as appropriate. A three-minute Public Comment statement to the Board in March is not a meaningful substitute for that part of the process.

Instead, the CAISO should consider characterizing the Special Study results in the Transmission Plan, allow one additional round of stakeholder comments, and issue supplements or updates after March if there are any changes. This is similar to the Bulk Storage Study update the CAISO recently issued for the last planning cycle.

Gates-Greg 230 kV Transmission Project

The CAISO stated at the Meeting that it is considering cancelling or deferring this project. This recommendation was made in light of: (1) Reduced reliability needs in the Fresno area based on recent load forecasts and other data; and (2) renewables-integration benefits that are less than the project costs.

LSA is concerned about the potential reduced availability of Helms, a valuable renewables-integration resource, based on what appear to be some fairly aggressive demand and behind-the-meter solar estimates. LSA strongly prefers deferring the project for a year or two instead of cancelling it altogether, to see if the current findings hold up over time.