

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the two additional studies for the 2018-19 Transmission Planning Process. The first is the “Increased Capabilities for Transfers of Low Carbon Electricity between the Pacific Northwest and California Information Study. This study is an important step to increased regional coordination in the West, which is essential to cost-effectively decarbonizing California’s electric sector. NRDC views this study as a starting point to identify and guide further efforts to increased regional coordination along the West Coast. In order to better fulfill the goals of the study, NRDC offers the following comments:

- Increased coordination between Los Angeles Department of Water and Power (LADWP) and CAISO is critical to efficient use of system resources between CAISO and the Pacific Northwest.
- The Draft Study Scope asks for stakeholder feedback on whether to use the 50% RPS portfolio or the 42 MMT portfolio transmitted from the California Public Utilities Commission Integrated Resource Planning process. The 42 MMT portfolio is most appropriate for this study as it is a policy-driven sensitivity and give a more accurate portrait of the benefits of coordination with the Pacific Northwest. We would also consider a sensitivity study and compare them side by side.
- In addition to utilizing a portfolio in alignment with California clean energy policy goals, it would be valuable to include a resource portfolio for the Pacific Northwest in alignment with Washington and Oregon’s clean energy policy goals. While the study appears singularly focused on the value of the Northwest’s hydro system, inclusion of expected clean energy buildout, especially in the 2028 scenarios, would change 1) the flexibility of the hydro system due greater non-hydro energy and capacity 2) the timing of hydro availability and 3) congestion within the Northwest’s transmission system.

The second study “Local Capacity Requirements Potential Reduction Study” NRDC views this study as an important to better understand the pending retirements and grid management with changing resources. In order to better fulfill the goals of the study, NRDC offers the following comments:

- NRDC supports the CAISO in taking steps to better utilize the existing transmission system.
- NRDC agrees with the priorities to target exploring alternatives to reduce requirements in half of the existing areas and sub-areas based on the attributes of the gas-fired generation to provide other system benefits and on the gas-fired generation being located in disadvantaged communities
- NRDC looks forward to reviewing transparent recommendations for approval of the identified transmission upgrades (including new technologies) that will be based on the results of economic assessments
- In particular, on Slide 12 in the presentation, the CAISO should include Fresno in the study as well as Ventura in Slide 13.
- Also, CAISO should be identifying the retirement dates for the six plants in the sub-areas.

Thank you for the opportunity to comment. We look forward to more discussions and study results.