

The Public Advocates Office Comments on the Transmission Development Forum

January 21, 2022 Web Conference

Introduction:

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) is the independent consumer advocate at the California Public Utilities Commission (CPUC) with a statutory mandate to obtain the lowest possible rates for utility services consistent with reliable and safe service levels, and the state's environmental goals. Cal Advocates submits comments on the Transmission Development Forum and the following topics covered at the January 21, 2022 Web Conference: 1) Support for the Transmission Development Forum, 2) The projected in-service date presented for the Alberhill 500 kilovolt (kV) project.

The Transmission Development Forum is a quarterly public stakeholder forum. It is held by the California Independent System Operator (CAISO), in conjunction with the CPUC and the participating transmission owners. The purpose of the Transmission Development Forum is to provide status updates on transmission projects previously approved through the CAISO Transmission Planning Process, as well as network upgrades identified in the generation interconnection process.

Comments:

- 1. Cal Advocates supports the Transmission Development Forum because it provides increased transparency and stakeholder engagement.**

Cal Advocates supports CAISO's facilitation of the Transmission Development Forum and values the increased transparency and stakeholder engagement that the Forum brings. Increased transparency and stakeholder engagement will help ensure accountability for transmission developers and improve public awareness of ongoing transmission investments and development. Cal Advocates also notes that this centralized forum and the regular sharing of information on developing transmission projects allows for timely identification of potential technical and project scheduling issues. Proactively resolving these issues can

help reduce avoidable added costs to ratepayers and mitigate scheduling delays for needed transmission development.

2. The projected in-service date presented by Southern California Edison Company (SCE) for the Alberhill 500kV project is highly speculative.

SCE proposes the Alberhill System Project (ASP) with a projected in-service date of October 2025. This projected in-service date is highly speculative. As noted by SCE, the ASP application for a Certificate of Public Convenience and Necessity (CPCN) is under review by the CPUC in Application (A.) 09-09-022. The CPUC recently extended the statutory deadline to issue a decision on this Application to December 19, 2022.¹ Furthermore, there is no certainty as to whether the CPUC will grant a CPCN for the project as proposed by SCE in its original Application. In addition, Cal Advocates emphasizes that further extensions of the proceeding deadline and potential modifications to the project scope could significantly change the projected in-service date presented by SCE. Cal Advocates recommends SCE avoid commitment of unnecessary resources to the development of the ASP and wait until the CPUC issues a decision on the CPCN.

Contact:

If you have any questions regarding these comments, please contact Edmond Yi at edmond.yi@cpuc.ca.gov

¹ CPUC Decision 21-12-052, A. 09-09-022.