



2020-21 Transmission Planning Process

Submitted by	Company	Date Submitted
Matt Lecar matt.lecar@pge.com	Pacific Gas and Electric Company	12/1/20

PG&E appreciates the opportunity to engage the CAISO and provide comments on the topics discussed in the November 17th stakeholder meeting for the 2020-21 Transmission Planning Process. PG&E's comments can be summarized as follows:

- PG&E asks the CAISO to modify the representation of benefit to cost ratios in economic transmission projects that include LCR reduction.
- PG&E supports the CAISO's efforts to evaluate historic Public Safety Power Shutoff (PSPS) event information to assess potential mitigations for the 2020-21 TPP cycle.
- PG&E categorizes the *All Tiers 2 & 3* and *All Tier 3* scenarios in the PSPS Impact Assessment as extreme. PG&E considers the two additional scenarios developed with information from PG&E as more reasonable, yet still conservative.

PG&E asks the CAISO to modify the representation of benefit to cost ratios in economic transmission projects that include LCR reduction.

In the CAISO's TPP Process for evaluating Economic Transmission Projects that include LCR reductions, the CAISO has relied on three scenarios to determine whether the transmission project should be compared against the price spread between System and Local RA, the CPM soft offer cap, or compare against an existing Reliability Must Run contract. Typically, the CAISO picks the scenario it believes fits the circumstances of the project and only provides an economic assessment of that scenario. PG&E asks the CAISO to instead provide the results from all three scenarios in the review of each economic project, including the Metcalf 500/230 kV Transformers Dynamic Series Reactor project, with the CAISO specifying which scenario it believes it applies. This way, stakeholders can provide information to the CAISO as to why that particular scenario the CAISO has selected may be incorrect and the CAISO will not need to conduct additional analysis during the final approval phase of the process.

PG&E supports the CAISO's efforts to evaluate historic PSPS event information to assess potential mitigations for the 2020-21 TPP cycle.



Overall, PG&E is supportive of the CAISO's inclusion of a PSPS risk assessment in the Transmission Planning Process. PG&E welcomes the opportunity to support the CAISO's identification of approved and potentially new projects that mitigate PSPS risk.

PG&E categorizes the *All Tiers 2 & 3* and *All Tier 3* scenarios in the PSPS Impact Assessment as extreme. PG&E considers the two additional scenarios developed with information from PG&E as more reasonable, yet conservative.

PG&E applauds the CAISO's effort to assess and mitigate PSPS risk. PG&E is working diligently to make PSPS events less frequent and shorter in duration with quicker restoration times. With that goal in mind, PSPS criteria continues to evolve in response to wildfire risk.

PG&E considers the five scenarios presented and compared in the November 17th stakeholder meeting as fairly conservative with the scenarios labeled "*All T2&3*" & "*All T3*" as extreme.¹ The two scenarios based on information supplied by PG&E are more reasonable, yet conservative.

PG&E looks forward to continued collaboration with the CAISO on this important effort and welcomes the CAISO studying the 2020 PSPS events as additional scenarios.

¹ 2020-2021 TPP Wildfire Impact Assessment Results Update (slide 5) delivered 11/17/2020