



## Stakeholder Comments

### 2020-2021 Transmission Planning Process Stakeholder Meeting November 17, 2020

Submitted by	Organization	Date Submitted
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The Transmission Agency of Northern California (“TANC”) appreciates this opportunity to provide comments on the California Independent System Operator Corporation’s (“CAISO”) 2020-2021 Transmission Planning Process (“TPP”) preliminary policy assessment results and preliminary economic assessment results that were presented at a stakeholder meeting on November 17, 2020.

TANC’s primary focus related to the TPP is to protect and maximize the transfer capability in both directions of the California-Oregon Transmission Project (“COTP”) and the California-Oregon Intertie (“COI”) consistent with the various applicable governing agreements. TANC’s comments focus on the preliminary economic assessment results.

TANC is encouraged that the CAISO has used the ADS Production Cost Model (“PCM”) 2030 v1.0 as a starting point for its economic assessment and rebuilt the CAISO system model in PCM with updated network topology, load forecasts and resource assumptions. The costs of congestion on the Pacific AC Intertie portion of the COI in the new model for the base portfolio have improved, but the hours of congestion are still low compared to historic annual Day-Ahead congestion hours. TANC believes that the improved economic modeling is a good step in the right direction and encourages the CAISO to continue to incorporate validated changes in the ADS PCM into the CAISO’s planning PCM. TANC requests that the CAISO continue to look at the causes of Day-Ahead congestion, both operational and analytically, within the TPP modeling and identify potential mitigation measures to alleviate the congestion burden on ratepayers. TANC is willing to assist the CAISO in this endeavor, as appropriate.

TANC supports the CAISO’s decision to include COI Corridor Congestion as a high-priority study area for which the CAISO will conduct a more detailed economic assessment and provide an updated assessment during the next TPP stakeholder meeting in February 2021.

TANC recognizes that the CAISO has made efforts to better recognize limitations associated with transmission outages. Scheduled and unplanned outages are major sources of limitations that will likely contribute to increased renewable curtailments in future years or exacerbate supply shortages at any time. TANC continues to monitor actual congestion compared to that forecasted by the CAISO and will seek to identify improvements in economic assessments to more accurately forecast future congestion. TANC encourages the CAISO to continue to improve its model and explore potential congestion forecast improvements.

TANC thanks the CAISO for the opportunity to provide these comments.