



WESTLANDS

SOLAR PARK

Westlands Solar Park Initial Comments Regarding the California Independent System Operators 2019-2020 Transmission Plan Draft Study Plan

The Westlands Solar Park (WSP) appreciates this opportunity to provide these preliminary comments on the California Independent System Operator's (CAISO) Transmission Planning Process (TPP) draft Study Plan (Study Plan). WSP recognizes that the TPP is a critically important and required annual undertaking by the CAISO, not only to meet requirements as a transmission planning authority but also to ensure that the required infrastructure is being identified and planned to meet California's clean energy policy goals.

WSP also understands that a significant portion of the key inputs into the Study Plan are supplied to the CAISO by various third party and regulatory bodies such as the demand forecast from the California Energy Commission (CEC), the resource portfolios from the California Public Utilities Commission (CPUC), and various system data from the CAISO's participating transmission owners (PTOs) and neighboring systems. These key inputs are a critical component to the TPP study plan but should not be the only inputs considered by the CAISO. Rather, we strongly encourage the CAISO to also consider and be guided by actual market developments and what is occurring within its own generator interconnection queue.

As the CAISO is aware WSP has hundreds of megawatts of active projects in the CAISO queue that are on track to achieve commercial operation in the next two years. WSP is committed to fully developing these projects and we believe that the California energy market will support the successful build-out of our projects along with other renewable projects currently in the CAISO's queue in the San Joaquin Valley and the Westlands competitive renewable energy zone (CREZ).

We all recognize that the California energy market is changing dramatically, and the 'old' inputs will not reflect the reality of the future energy market next year let alone in the 10-year planning horizon of the TPP. We are also confident that the CPUC resource portfolio data set will not accurately reflect where and when renewables will be built to serve California consumers. The CPUC's IRP data set(s) have zero or very limited build-out of the Westlands CREZ. There are likely several reasons for this, but they do not match with the reality of the market or of what the CAISO knows is occurring via the generator queue and project interconnection process. In fact, WSP is in power purchase agreement (PPA) negotiations with several parties that are within the CAISO balancing

authority area (BAA) planning region. These potential PPAs include load serving entities (LSEs) that are required to file integrated resource plans (IRPs) with the CPUC (such as community choice aggregators and direct access providers) as well as LSEs that are not subject to CPUC jurisdiction but are within the CAISO BAA planning region. We believe that it is important that the CAISO consider the potential RPS requirements as required under SB 350 and most recently SB 100 and renewable procurement plans for all LSEs that are within its planning region and not rely exclusively on the data sets from the CPUC.

Additionally, there are several new and emerging CCAs that are expected to be operational well within the 10-year planning horizon of the 2019-2020 TPP, that have not yet filed IRPs with the CPUC, or have acknowledged are not final versions. These 'unknowns' coupled with the emerging market of commercial and industrial customers entering into virtual PPAs for renewable supply will support a build-out that could look significantly different than the portfolios provided by the CPUC. While we would not expect the CPUC to necessary speculate where non-jurisdictional entities, emerging CCAs and C&I customers would purchase renewable project from because they lack necessary insights to make certain assumptions, the CAISO has those insights via the generator interconnection queue.

In addition to WSP, there are numerous additional projects in the CAISO queue in the San Joaquin Valley. Solar projects in this region are beginning to have commercial success within the California market. Existing and emerging federal, state and local policies support the development of significant renewable projects in the Westlands CREZ.

We respectfully request that the CAISO, at a minimum, perform a sensitivity analysis for at least 2000+ MW additional build-out of the Westlands CREZs. Failure to perform this type of a sensitivity analysis would be to neglect an important function that the CAISO as a planning authority should consider and evaluate and is not aligned with emerging market realities and evolving federal, California and local policies regarding land use, water use, disadvantaged communities, and renewable development.

Thank you for your consideration of these comments.

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