



Comments of American Clean Power – California (ACP-California) on the January 21, 2022 Transmission Development Forum

February 4, 2022

Introduction

American Clean Power - California (ACP-California) is the voice of the clean power industry in California, focusing on California's market and policies for a reliable and affordable transition to 100% clean energy.¹ ACP-California has been raising concerns around, and brainstorming solutions to, the delays that have been occurring to the permitting and construction of transmission facilities necessary to enable new clean generation resources to come online and support Resource Adequacy (RA) requirements. Completion of transmission upgrades and expansion projects will be critical to near-term reliability and long-term decarbonization, facilitating delivery of renewable energy projects to Californians.

ACP-California greatly appreciates the work that the California Independent System Operator (CAISO), the California Public Utilities Commission (CPUC), and the Participating Transmission Owners (PTOs) collectively put into the first Transmission Development Forum, which was held on January 21, 2022. Overall, the Transmission Development Forum was a success and provided a powerful and necessary first step in bringing transparency to the process and timelines for permitting and completing transmission projects approved in the Transmission Planning Process (TPP) or included in a signed Large Generator Interconnection Agreement (LGIA). ACP-California appreciates the increased transparency and increased information availability brought by the Transmission Development Forum. The Forum is a useful venue for generation developers to understand the status of upgrades that may affect them and for PTOs to provide information on the challenges that cause project delays, such that solutions to those challenges can begin to be put in place.

We look forward to continued participation in future Transmission Development Forums and, below, offer a few suggestions on additional information that should be included in PTO presentations and recommend some standardization of the presentation approach going forward.

¹ [American Clean Power](#) is the voice of the clean power industry that is powering America's future, providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the U.S. economy and driving high-tech innovation across the nation. We are uniting the power of America's renewable energy industry to advance our shared goals and to transform the U.S. power grid to a low-cost, reliable and renewable power system. ACP-California is a state project of the national trade association.



Additional Information and Standardization of Materials would be Beneficial in the Future

The materials that were presented by the PTOs were very useful. They would be more useful and easier to digest if there was additional standardization of what is presented and if more information can be provided on each of the projects included in the presentations.

For instance, some PTOs presentations included information on the original in-service date of the project. Going forward, it would be helpful for the presentation materials (and associated spreadsheets) to include:

1. The original anticipated in-service date for the project was first approved/included in a LGIA
2. The expected in-service date that was presented at the prior Transmission Development Forum
3. The current expected in-service date

Providing this information will help provide additional transparency around project delays and help stakeholders easily identify which projects are falling behind. This will enable more proactive solution development for key projects that being to be delayed.

Additionally, PTOs should report on the capacity (MW) of resources in the queue which are dependent on the relevant transmission upgrade/project and whether those generators require the project to interconnect or to achieve deliverability. More granular information on the generation projects that are dependent on these upgrades (without providing project-specific information) would also be incredibly useful. For instance, the PTOs should report, for each upgrade not only how many MW are dependent on the upgrade but also break the capacity out by on how many MWs have signed LGIAs, how many are in Phase I, and how many MW are in Phase II. Having this information available, consistently from all PTOs, would help the CPUC, CAISO, and stakeholders identify the most critical upgrades to enabling new capacity to come online and support RA requirements.

Finally, it would be valuable for the PTOs to include information for each delayed upgrade explaining the primary cause of the delay. This will help increase transparency and will help all stakeholders better understand the cause of transmission delays, such that appropriate solutions can begin to be put into place. For instance, if achieving permitting approval is the primary source of delays, there may be steps the CPUC can take to mitigate those delays. And if staffing concerns are the primary source of the delays, other solutions can begin to be assessed.

Conclusion

ACP-California appreciates CAISO organizing the first Transmission Development Forum and hosting them going forward. We also appreciate the engagement and work by the CPUC and



PTOs. We look forward to the benefits brought by the increased transparency and look forward to continuing to work with parties to ensure transmission projects come online in a timely fashion in order to support the interconnection and delivery of new clean energy resources in the state.