

## **BAMx Comments on Transmission Development Forum**

The Bay Area Municipal Transmission group (BAMx)<sup>1</sup> appreciates the opportunity to comment on the materials presented at the Transmission Development Forum on April 26, 2022. We request that the California Independent System Operator (CAISO) and the California Public Utilities Commission (CPUC) address the following issues in the future.

### **BAMx Applauds CAISO and CPUC's Joint Effort in Establishing Transmission Development Forum**

BAMx applauds the CAISO and the CPUC's joint efforts in establishing the Transmission Development Forum. There is clear stakeholder interest in project development updates and tracking the CAISO-approved projects from the transmission planning process (TPP) and generation interconnection process (GIP). BAMx also applauds the CAISO and the CPUC for listening to the stakeholders' needs and the foresight in creating this much-needed forum.

### **BAMx Supports the CAISO and CPUC's Proposed Plan to Update and Inform Stakeholders on Project Status on Quarterly Basis**

During the April 26, 2022 call, the CAISO indicated it is proposing to host the Transmission Development Forum quarterly. The CAISO also proposed updating and posting workbooks of the approved TPP projects and GIP network upgrades on the CAISO website for stakeholder access. BAMx supports both proposals.

### **BAMx Applauds CAISO's Efforts Over Last Quarter Establishing Common Format And Development Metrics In Tracking And Communicating Transmission Project Status**

In BAMx's February 2022 comments, we had suggested establishing a common and consistent reporting format and convention for both the TPP and GIP projects, as the differences between TPP and GIP projects created confusion. In the April 2022 version of the TPP-approved project and GIP-driven network upgrades workbooks<sup>2</sup>, BAMx noticed that CAISO and the participating transmission owners (PTO) had aligned the formatting of the workbooks and presentations. For example, similar to the other PTOs, PG&E in the April 2022 version has included a new column that clearly identifies the specific Cluster study, which identified the particular network upgrade. BAMx also appreciates CAISO updating the TPP-approved projects list with the projects approved in the 2021-2022 Transmission Plan.

BAMx reiterates its February 2022 comments that the TPP projects and GIP network upgrades should be developed and placed in-service unless found to be no longer needed or cost-effective after the CAISO's approval. BAMx urges the CAISO and CPUC to establish "project health" metrics and leading indicators to be included in the PTO's quarterly reporting, such as - Is a project proceeding on schedule? What is the PTO's recovery plan to get back on schedule?

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<sup>1</sup> BAMx consists of the City of Palo Alto Utilities and City of Santa Clara, Silicon Valley Power.

<sup>2</sup> <http://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=CADDD9EF-0966-47B7-934F-0678FEE5279C>

Scope, cost, and schedule are the three key parameters of a project. Similar to the in-service date reporting requirement, BAMx recommends the CAISO and CPUC request the PTOs include the original CAISO approved costs and the current estimates in their reports. CAISO, in response to BAMx's February 2022 comments, stated the following.<sup>3</sup>

“At this time the cost information will not be included in the quarterly updates for the approved transmission planning projects or the network upgrades. The CAISO will explore adding the cost information to the tables in chapter 8 of the annual transmission plan.”

We appreciate the CAISO's willingness to update the cost data for the TPP-approved project on an annual basis. However, it does not address BAMx's concerns about the tracking costs associated with the GIP-driven network upgrades. We urge the CAISO to have PTOs report the capital cost of all the GIP-driven projects as part of their reporting.

### **Conclusion**

In closing, BAMx appreciates the opportunity to provide comments on the Transmission Development Forum. BAMx also appreciates the CAISO and CPUC's joint sponsorship of the project information and updates provided by the PTOs. BAMx looks forward to working with the stakeholders in this important forum.

If you have any questions concerning these comments, please contact Paulo Apolinario ([papolinario@svpower.com](mailto:papolinario@svpower.com) or (408) 615-6630)

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<sup>3</sup> <http://www.caiso.com/Documents/ISOResponsestoCommentsMatrix-TransmissionDevelopmentForum-Jan212022.pdf>