



Stakeholder Comments

50% RPS Study Plan

Submitted by	Company	Date Submitted
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CESA appreciates the opportunity to comment on the CAISO’s 50% RPS Special Study (50% RPS Study) to be included in the CAISO’s 2016 – 2017 Transmission Planning Process (TPP). CESA’s concern regarding the 50% Study is an overarching one that relates to all of the special studies underway and planned in the CAISO’s Final Study Plan. Unsurprisingly, none of the special studies are currently scoped to consider the impact of major energy market changes taking place in real time, such as the response to the Aliso Canyon gas leak and PG&E’s recent announcement that it intends to shut down Diablo Canyon and replace it with renewables and other preferred resources, including energy storage. CESA submits that the CAISO should consider revisiting *all* of the special studies included in the Final Study Plan to account for events of this magnitude, and that the scopes of the CAISO’s special studies should be modified if need be, to conform to a Revised Final Study Plan.

On June 22, 2016, CESA submitted comments supporting the SB 350 Special Study currently investigating potential transmission needs to meet the state’s goal of 50% renewables by 2030 (SB 350 Study). CESA recommended in those comments that the CAISO study how non-wire alternatives can cost-effectively meet transmission needs. Apparently, the plan for the SB 350 Study is that it will be ‘informational only’, and will be used to improve transmission inputs into the RPS calculator 6.3, which will be used to develop RPS portfolios that will be used in future TPP cycles beginning with the 2017 – 2018 TPP. Draft resource data updates to the 50% Study are planned to be available at the TPP meeting to be held in November 2016, and the final 50% RPS Study is expected to be finalized early in 2017.

CESA is also on record in March 2016 as commending the CAISO for conducting a Bulk Energy Storage Resource Case Study (Bulk Storage Study) in the 2015-2016 TPP planning process that

explored the ability of a bulk storage resource to reduce production costs, emissions, renewable curtailments, and renewable overbuilds. The Bulk Storage Study represented a major step toward demonstrating the value of bulk storage resources in a high renewables future. However, CESA has also recommended that continued special studies be conducted on bulk storage systems. For example, the CAISO can build on the Bulk Storage Study by quantifying the transmission benefits and impact of bulk storage systems -which was not within the scope of the Bulk Storage Study. With the passage of Senate Bill 350 that instituted a 50% RPS by 2030, CESA believes the Bulk Storage Study should be re-run with the new 50% RPS goal as a basic assumption.

To be very clear, CESA does not recommend slowing progress on any of the special studies underway. The adjustments in assumptions used for the 2015-2016 TPP recommended in these comments should not be disruptive if they are addressed now, rather than many months into the future. CESA appreciates the CAISO's consideration of these comments and looks forward to continued participation in the CAISO's 2015-2016 TPP.