



Comments of the California Energy Storage Alliance on the January 21, 2022 Transmission Development Forum

Submitted by	Organization	Date Submitted
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1. Summary

CESA appreciates the ISO, in collaboration with the California Public Utilities Commission (CPUC) and participating transmission owners (PTOs), for convening the first inaugural Transmission Development Forum (TDF). Given the volume of energy storage projects that are projected to be deployed and constructed over the next few years, the timeliness of network upgrades and transmission infrastructure buildout will play a critical role in ensuring near- and medium-term reliability and meeting our long-term decarbonization goals. To this end, CESA is strongly supportive of the launch of the TDF, which will serve as a helpful forum to increase transparency and inform project development activities. CESA also agrees with the planned quarterly cadence of the TDF meetings that balances the need to provide regular updates and the amount of time between when updates are more substantive.

While strongly supportive of the purpose and information shared at the TDF, CESA recommends that the TDF reports provide information in a standardized way, along with potential additional information categories, such as whether a particular transmission project is in the process of necessary land or obtaining CPUC permitting. Any qualitative information on the level of certainty of the planned in-service dates would also inform developers, load-serving entities (LSEs), and regulators on project development timelines. Furthermore, CESA requests that the PTOs provide an additional category of information regarding any reasons for the delays to the expected in-service date. Finally, CESA seeks to better understand how the PTOs prioritize various transmission upgrades.

Notwithstanding these suggestions, CESA reiterates our appreciate and support for the TDF. In addition to these general points, we also seek clarification on the status updates for several projects in the Los Angeles (LA) Basin.

2. Clarification on status updates

CESA requests clarification on the status of projects expected to significantly increase the transmission capability of the LA Basin local reliability area (LRA) and its associated sub-areas. According to the Final 2022 Local Capacity Technical Report

(LCTR) and the Final 2026 Long-Term LCTR, the requirements of the LA Basin LRA significantly decrease in the 2022-2026 period due to the completion of four transmission projects:

- Mesa Loop-In Project (230 kV)
- Mesa Loop-In Project (500 kV)
- Delaney-Colorado River 500 kV Line
- West of Devers 230 kV Upgrades

From Southern California Edison's (SCE) presentation, CESA understands that the Mesa Loop-In Project at 500 kV is currently expected to have an in-service date of May 2022, over two years later than considered at the approval of the transmission plan. Unfortunately, SCE's presentation does not identify the status of the three other aforementioned projects that will impact the transmission capability of the LA Basin LRA. CESA is currently engaged in research and analyses focused on strategies to preserve resource sufficiency in the LA Basin while advancing California's decarbonization and environmental justice goals. Understanding potential transmission risks that may hinder expected import capabilities is essential to prepare for contingencies and identify a no-regrets procurement strategy. As such, CESA requests SCE to clarify on the status of the projects identified above and requests identify the currently estimated in-service dates of these projects. A description of the upgrades, as well as potential delay risks and their expected magnitude (*i.e. duration*) would be particularly welcome.