

## CPUC Energy Division

Comments on the Transmission Development Forum on April 26, 2022

The CPUC's Energy Division (ED) appreciates the opportunity to comment on the second Transmission Development Forum (TDF) held on April 26, 2022. ED commends the work of the California ISO (ISO) and its colleagues at the CPUC for coordinating the TDF. Further, ED appreciates the responsiveness to Stakeholders' comments on the first TDF with respect to making the data presented in the workbooks more consistent across the utilities, as well as keeping the "Original Estimated In-service Date" data field in the in both the TPP Project and Generator Interconnection Network Upgrades workbooks.

ED has noticed that there are several other data fields that stakeholders have identified as being important for providing the transparency reasonably expected from the TDF. As noted in the ISO's responses to comments on the first TDF in January 2022 (ISO Responses), Bay Area Municipal Transmission Group (BAMx) articulated that "[s]cope, cost, and schedule are the three key parameters of a project." (ISO Responses, p.5) ED agrees that any process aiming to provide transparency to stakeholders should reasonably include these. ED also supports California Community Choice Association's (CalCCA) additional suggestion of including data about a projects' dependence on other projects to better understand how the changing status of one can affect another. (ISO Responses, p.6)

### PROJECT COSTS NEEDED

Energy Division's team notes that load customers in the ISO have a greater stake in specific generator interconnection-related projects than in any other ISO or RTO region in the country. Unlike load customers elsewhere, because of the ISO's "participant financing" cost allocation method for network upgrades triggered by generator interconnections, ratepayers pay for the entire cost of such network upgrades. In other regions of the country, it is common that the costs of interconnection-related upgrades are cost-shared or borne solely by the generators through a "participant funding" approach to cost allocation. In the ISO, while a generator initially finances the costs of a network upgrade, over the five years following commercial operation, the generator is paid back by the transmission owner (TO), after which, all of the costs of the network upgrade are in the TO's rate base and recovered from ratepayers (multiple times over) during the decades-long life of the asset. Because load customers are burdened by the recovery of the full cost of these network upgrades, they are most certainly Stakeholders, and cost information related to both network upgrades and the cost of TPP-approved projects is essential to include in the TDF. ED also agrees with BAMx's January TDF comments that in addition to the current estimated cost for both TPP projects and interconnection-related upgrades, the data should include the original estimated cost at the time of ISO approval in the TPP, as well as the original estimated cost of network upgrades when determined in the GIDAP. (ISO Responses, p.4)

## ADDITIONAL DATA FIELDS IMPORTANT TO STAKEHOLDERS

### Schedule of Projects and Network Upgrades

As the goal of the TDF is to provide transparency for Stakeholders on generator interconnection-related TPP projects and network upgrades, understanding the timing of these projects is important. American Clean Power California (ACP-California) expressed the importance of including original anticipated in-service dates for both projects and upgrades. (ISO Responses, p.2) The ISO suggested in its responses to January TDF comments that the columns showing the expected in-service dates for the current and prior TDF would be included, but that the original estimated in-service date would not be provided after the first TDF's workbook (ISO responses, pp.2,4). The inclusion of the full timeline of both TPP projects and network upgrades is useful to help stakeholders understand the prioritization, scope, and timing of projects. This can be particularly true when one project or upgrade is dependent on another. ED notes and appreciates that the TDF workbooks continue to include the important information on the original estimated in-service dates.

The ISO noted in the responses to January TDF comments that ACP-California requested that TOs "include information for each delayed upgrade explaining the primary cause of the delay." (ISO Responses, p.2) In addition to the importance of maintaining the original estimated in-service date for all projects and upgrades, ED agrees with ACP's request to include a column explaining the reason for the delay for any project or upgrade that slips by more than a year from its original estimated in-service date. Further, a column should be included to explain the main reason for any slippage or advancement of the in-service date of a project or upgrade from one TDF to the next. ED understands that any legitimately sensitive or confidential information would not be used to populate these data fields.

### Project Dependencies

In its responses to comments on the January TDF, the ISO noted that Cal CCA recommended, "[a] column that lists any other transmission projects or generation interconnection network upgrade projects that are dependent on the project to allow parties to identify potential impacts changes to project status have on other projects." (ISO Responses, p.6) The ISO responded, "The workbook will include this information." (ISO Responses, p.6) ED agrees that this is important information for Stakeholders, and while this information was not included in the April TDF, looks forward to the ISO including this column in both workbooks in advance of the next TDF.

### Incomplete Data from Transmission Owners

As mentioned above, there was marked improvement in the consistency of data from the January TDF to the April TDF. However, there remain a number of unpopulated data fields throughout the project and upgrade workbooks. ED hopes that the next TDF's workbooks will include complete data from all TOs. Additionally, as it is understandable that some data fields may be "not applicable" (N/A) or "to be determined" (TBD), and ED asks that those be entered where appropriate. In the recent workbooks it was difficult to determine whether the data simply was not made available, or whether "N/A" or "TBD" would have been a more accurate entry.

The CPUC Energy Division appreciates this opportunity to provide comments and commends the ISO's and CPUC's efforts to continue improving the usefulness of the TDF for Stakeholders.