

# State of California

## Memorandum



**Date:** May 9, 2023  
**To:** CAISO Staff  
**From:** Energy Division Staff, California Public Utilities Commission  
**Subject:** Comments on the Transmission Development Forum (TDF), April 25, 2023

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The Energy Division of the California Public Utilities Commission (CPUC) develops and administers energy policy and programs to serve the public interest, advise the Commission, and ensure compliance with CPUC decisions and statutory mandates. The Energy Division provides objective and expert analyses that promote reliable, safe, and environmentally sound energy services at just and reasonable rates for the people of California.<sup>1</sup> Further, the Energy Division advocates on behalf of California ratepayers at the Federal Energy Regulatory Commission (FERC).

The CPUC Energy Division Staff (Staff) appreciate this opportunity to provide comments on the Transmission Development Forum (TDF). Staff comments address the previous TDF project updates, PG&E's reprioritization of projects, and competitively awarded projects.

1. PG&E's North of Mesa Upgrade alternative recommended by the CAISO

The North of Mesa Upgrade project is pending cancellation per the draft 2022-2023 Transmission Plan with the CAISO instead recommending a 95 MW storage facility and spare transformer at the Mesa substation. Can PG&E please clarify if the new in-service date (ISD) presented at the April TDF (10/21/32) is representative of the battery storage project timeline or is it the ISD if the North Mesa Upgrade project were not cancelled?

2. SCE's Alberhill 500 kV, Victor 230 kV Switchrack Reconfiguration, and Mira Loma 500 kV CB Upgrade

The three projects listed above were previously included in the January 2023 TDF but were not mentioned in the April 2023 TDF. The Alberhill project had an ISD of June 2029 "contingent on licensing." Similarly, the Victor project had been updated with an ISD of June 2025 while the Mira Loma project had an updated ISD of "pending." Can SCE

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<sup>1</sup> More information about the CPUC Energy Division is available at: <https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division>

explain these omissions from the April 2023 TDF and confirm that there are no reportable changes for the three projects?

### 3. PG&E's Reprioritization

During the April 2023 TDF, PG&E was asked about the impacts of funding on projects' status. Can PG&E please confirm that assigning an "initiating" status for a project indicates that necessary funding has been acquired to continue that project? Energy Division requests further explanation given the multiple projects that have experienced delays due to "funding limitations" as described in the Approved Projects List Spreadsheet from the TPP. Energy Division also requests that PG&E provide greater detail explaining "reprioritization" when it is identified as the cause of project delays. In other words, it is reasonable for PG&E to explain what is taking priority over these projects.

### 4. Additional Information and Updates for Competitively Awarded Projects

It is understood that on competitively procured projects, incumbent utilities must coordinate on timing and work scope with the successful sponsors of competitively-bid projects. Energy Division finds it reasonable that for any in-flight project that was awarded competitively in the TPP, and which fits within the scope of the TDF, both the winner of the competitively procured portion of the project and the incumbent utility that needs to interconnect the project, present jointly on the overall project in the TDF. This will proactively provide clarity on the project and help to assure stakeholders that the project is being implemented in an efficient manner.