

State of California

Memorandum



Date: February 9, 2023
To: CAISO Staff
From: Energy Division Staff, California Public Utilities Commission
Subject: Comments on the Transmission Developer Forum (TDF) meeting held on January 25, 2023

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.¹ Further, the Energy Division advocates on behalf of California ratepayers at the Federal Energy Regulatory Commission (FERC).

The CPUC Energy Division Staff (Staff) are grateful for this opportunity to provide comments on this Transmission Development Forum (TDF) meeting and process generally. Staff comments address the timeliness of updating the CAISO webpage with response comments, aggregating MW information for interconnection projects, network upgrades in the generator interconnection process, PG&E's projects status summary, and SCE's approved transmission planning projects.

1. Please be timely in posting the response to stakeholder comments submitted from previous TDF meetings.

The Energy Division's FERC Cost Recovery Section supports the comments made by the Public Advocates Office (PAO) and other stakeholders requesting CAISO to be more timely in posting written responses to comments submitted on previous meetings. The last TDF meeting occurred on October 28, 2022 and the response was posted on the morning of the next meeting (January 25, 2023). We believe it is important for the CPUC and other stakeholders to be informed on the stakeholder comments and responses and having them only hours before the next TDF meeting hinders proper collaboration.

2. Aggregate MW information of interconnection projects.

Thank you informing the stakeholders on the absence of the aggregate MW information for Q1 2023. It was stated that it will be made available in Q2 2023. Please continue to provide status

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

updates for any changes in preparing and posting this information (particularly if nothing is expected like for Q1 2023).

3. Network Upgrades in the generator interconnection process: Please reconsider the decision to only include projects that have an executed Large Generator Interconnection Agreement (LGIA).

The \$200 million capital cost or greater than 200kV operating threshold for large generator projects excludes a significant portion of projects of interest for the CPUC, and likely for other stakeholders as well. The CPUC understands and appreciates the caveat that CAISO can identify projects of policy significance but an objective but lower threshold for projects to be discussed should be considered.

4. PG&E Projects Status Summary: Reprioritization

Of the 20 projects presented in the slide-deck by PG&E, eight (8) were identified as being impacted by “reprioritization.” The FERC Cost Recovery Section requests that the CAISO require PG&E to provide further clarification on driver(s) behind the reprioritization impacting these projects. Stakeholders deserve to understand whether the reprioritization is a PG&E territory-wide policy decision, a CAISO planning driver, or due to other factors. It is a reasonable expectation that stakeholders would receive such explanations on this and other substantial impacts.

5. SCE Approved Transmission Planning Projects and Queue Network Upgrades

Nearly all the 11 projects presented by SCE were delayed from their original expected in-service date (ISD). Of special concern are the projects that were delayed by decades (e.g., Alberhill – 15 years, Method of Service – 18 years) or delayed indefinitely (e.g., Barre, Mira Loma, WOCR CRAS). It is likely that such delays will also result in project cost increases. The FERC Cost Recovery Section requests that the CAISO require SCE to explain to stakeholders what mitigation measures SCE is implementing to avoid further delays and project cost increases. It is a reasonable expectation that stakeholders would receive such explanations on this and other substantial impacts.