



Comments on April 25, 2023 stakeholder call discussion CAISO Transmission Development Forum Q2 2023 Reports

Comments Due May 9, 2023

Comment period

April 25, 2023, 08:00 am – May 9, 2023, 05:00 pm

Submitting organizations

- California Public Utilities Commission - Public Advocates Office

California Public Utilities Commission - Public Advocates Office

Contact

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On April 25, 2023, the California Independent System Operator (CAISO) held its quarterly Transmission Development Forum (Forum) meeting in collaboration with the California Public Utilities Commission (CPUC), and CAISO Participating Transmission Owners (PTOs) including Valley Electric Association/GridLiance West (VEA/GLW), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Pacific Gas and Electric Company (PG&E).

The purpose of the Forum Meeting is to create a single forum to track the status of transmission network upgrade projects that affect generators and all other transmission projects approved in the CAISO's Transmission Planning Process (TPP). The CAISO Forum Meeting includes previously approved TPP projects and network upgrades identified in the generator interconnection process. Only new resource projects that have executed a Large Generator Interconnection Agreement (LGIA) are included in the Forum Meeting.

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) is an independent consumer advocate with a mandate to obtain the lowest possible rates for utility services, consistent with reliable and safe service levels, and the state’s environmental goals.¹ Cal Advocates provides these comments on the CAISO’s April 25, 2023 Forum Meeting.

The Forum Meeting provides increased transparency and public awareness of ongoing transmission development timelines. The Forum Meeting facilitates the timely identification of technical and project scheduling issues. Proactively resolving these issues can help reduce avoidable added costs to ratepayers and mitigate scheduling delays for needed transmission additions.

A Comprehensive Forum Meeting is Needed

Currently, the Forum Meeting quarterly meetings address only a subset of the individual PTO’s CAISO-approved, but not yet built, transmission and interconnection projects. Specifically, each PTO only identifies a small fraction of its total number of projects to discuss in the Forum Meetings. In addition to the quarterly Forum Meetings, the CAISO should hold a bi-annual or annual discussion of the totality of each PTO’s outstanding projects and its plan for completing its projects in a timely fashion. This “big picture” review would help the CAISO and stakeholders to understand the magnitude of any backlogs and plans, reasons for delays, and plans to address any problems.

Transmission Planning Process (TPP) Should Take Notice of Forum Meeting Status

In comments to the previous (10/28/22 and 02/08/23) Forum Meeting, Cal Advocates noted that it is critical that CAISO scrutinize the need for previously approved transmission projects that are severely delayed. If a project was found to be necessary by CAISO over a decade ago and is still not built or scheduled, the necessity of the project should be questioned. It is imperative that CAISO re-evaluate project necessity under current conditions. CAISO’s written response was “The assessment of need for facilities is not a part of the scope of the transmission development forum. This question is applicable to the CAISO’s transmission planning process (TPP).” Given that the Forum Meeting process and TPP are both under the umbrella of the CAISO, the TDF staff should

¹ Public (Pub.) Utilities (Util.) Code Section 309.5.

regularly communicate the updates from the Forum Meeting process with the CAISO TPP staff.

Cal Advocates recommends the CAISO, in this year's 2022-2023 TPP, should re-evaluate the need for PG&E's 13 severely delayed projects that were approved prior to the 2011 TPP.² If CAISO finds that the need for these projects has diminished, these projects should be eliminated. This critical analysis could provide necessary ratepayer relief and reduce PG&E's unacceptable backlog of transmission projects.

Likewise, the CAISO 2022-2023 TPP should take into consideration PG&E's backlog of 82 CAISO-approved transmission projects that are delayed or pending operational status before adding to its backlog with this year's TPP approved projects. CAISO plans to approve 46 transmission projects in the 2022-2023 TPP and 18 of those projects would be assigned to PG&E. CAISO should consider market alternatives within the context of its tariff to help alleviate PG&E's problem.

Cal Advocates request that the CAISO and the PTOs provide a dashboard of charts that include the following by each PTO:

From the Transmission Planning Process spreadsheet:

- Expected Years to Completion versus Number of Projects
- TPP Year Project Approved versus Number of Projects

From the Generation Interconnection spreadsheet:

- Expected Years to Completion versus Number of Projects
- Year that the Generation Interconnection was Triggered versus Number of Projects

Timely Response to Stakeholders

Cal Advocates appreciates the effort CAISO puts into tracking the transmission development timelines of all the PTOs. Cal Advocates notes that in its most recent Forum Meeting, the CAISO posted its responses to Stakeholder Comments

² Per the Forum Meeting workbook, PG&E has 7 delayed projects that were approved before 2010 and 13 projects that were approved prior to the 2011 TPP.

from the February 8, 2023 submissions on April 21, 2023 which was just two days before the quarterly TDF meeting on April 25, 2023. Cal Advocates recommends posting the CAISO response to Stakeholders Comments from the previous TDF meeting at least one week before the upcoming TDF meeting.

Improve Transparency

In comments to the previous (02/08/23) Forum Meeting for improved transparency, Cal Advocates recommends the CAISO record Forum Meetings and post the recordings on the CAISO Forum Meetings webpage consistent with its practice for other CAISO stakeholder engagement initiatives and workshops. Forum Meetings provide important information and a key engagement platform for external stakeholders. Forum Meetings should be recorded for stakeholders who cannot attend at the specific time and published to inform stakeholders and the public. CAISO has demonstrated that there is no technological or logistical barrier to recording and publishing other workshops or stakeholder engagement events.

The CAISO April 25, 2023 Forum Meeting presentation (page 2) states that given the expectation that documentation from these calls will be referred to in subsequent regulatory proceedings, the Forum Meeting webinars are not recorded. CAISO should provide a more detailed explanation on what regulatory proceedings it is referring to and why a recorded webinar would create a concern. CAISO President and Chief Executive Officer, Elliot Mainzer, has mentioned on numerous occasions that he seeks to improve the CAISO's transparency.³ Providing archived webinars for the Forum Meetings and all other CAISO meetings would advance this goal.

To improve the transparency of the TDF meetings, each of the presenting PTOs should follow the SCE best practice of providing the original TPP target on-line date for projects that are being rescheduled.

³ California State Legislature 2019-2020 Session, State Assembly Committee on Utilities and Energy Committee Hearing: Mid August Heat Storm Joint Preliminary Report by CEC, CPUC, CAISO, Oct 12, 2020, Statements by Elliot Mainzer, CEO, California Independent System Operator.