



Comments on January 25, 2023 stakeholder call discussion CAISO Transmission Development Forum Q1 2023 Reports

Comments Due February 8, 2023

Comment period

January 25, 2023, 08:00 am – February 8, 2023, 05:00 pm

Submitting organizations

- California Public Utilities Commission - Public Advocates Office

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Contact

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On January 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 January 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 determines which small fraction of its total number of projects to discuss. What would be helpful for all stakeholders and the public would be 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) Forum Meeting, Cal Advocates noted that it is critical that CAISO scrutinize the need for previously approved transmission projects that are severely delayed. We specified that 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 reestablish 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).” Cal Advocates recommends that given that the Forum Meeting process and TPP are both under the umbrella of

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

the CAISO, that it should regularly communicate the results of the Forum Meeting process with the CAISO staff working the TPP process.

As Cal Advocates recommended, 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 massive backlog of 83 CAISO approved transmission projects that are delayed or pending operational status before adding to its backlog with this year's TPP approved projects. CAISO should consider market alternatives within the context of its tariff to help alleviate PG&E's problem.

Timely Response to Stakeholders

Cal Advocates appreciates the effort CAISO puts into tracking the transmission development timelines of all the PTOs. That said, it would be helpful that in the spirit of the CAISO's stated willingness to be open and responsive to stakeholders, that CAISO post replies to stakeholder Forum Meeting comments prior to its hosting of the subsequent quarterly Forum Meeting. Otherwise, stakeholders will not know whether its comments from the previous Forum Meeting were understood and acknowledged.

Improve Transparency

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

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.

technological or logistical barrier to recording and publishing other workshops or stakeholder engagement events.

The CAISO January 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 should explain if and why it is unable to record the Forum Meeting webinars and then work with stakeholders to develop a solution to eliminate whatever barriers, CAISO believes exists (e.g., refrain from providing the specific information that creates the regulatory 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 be a step in the right direction.

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