

**2018-19 Transmission Planning Process (TPP)**

Submitted by	Company	Date Submitted
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PG&E provides the following comment in the 2019-20 Transmission Planning Process (TPP) based on the Stakeholder meeting held September 25-26, 2019.

**OCEI is still needed**

PG&E’s proposed Northern Oakland Area Reinforcement Project is a long-term combination of transmission solutions that will address a number of needs, including load serving capability increase, public safety (replacing infrastructure in high fire risk areas that has been identified as needing lifecycle upgrades), and addressing the 2010 NERC Recommendations to Industry. As this is a major, multi-pronged project, in a densely populated, urban portion of the system, PG&E anticipates that this project, if approved, will take at least 7 years, if not longer, to site, permit, and construct.

PG&E requests that CAISO confirm in this year’s Transmission Plan that the Oakland Clean Energy Initiative (OCEI), which was approved in the 2017-18 TPP and subsequently modified in the 2018-19 TPP, is still necessary to provide near-term reliability within the North Oakland subarea. OCEI can be brought into service quickly (by the end of 2022), as compared to the construction of the long-term transmission solutions. During this timeframe, PG&E expects CAISO to facilitate a coordinated, phased transition and termination of the Reliability Must Run (RMR) agreement with the Vistra Oakland Power Plant, in tandem with the new OCEI resource additions.

PG&E appreciates CAISO confirming the continued need for the OCEI and requests CAISO use this year’s Plan to identify the location and amounts of any additional resource requirements associated with the incremental load growth in this year’s forecast.