

March 11, 2021

SWPG appreciates the opportunity to submit comments on the CAISO's 2021-2022 draft Transmission Study Plan (plan).

SWPG's comments are limited to confirming that the CAISO intends to study, with equal emphasis, renewable wind generation sources outside of California which import both to the Palo Verde and the El Dorado interties. The CPUC's instructions regarding this in its February 11, 2021 decision seem clear:

“...CPUC staff is not able to determine at which busbar location injection would best meet policy goals while minimizing costs to ratepayers. For this reason, CPUC staff appreciates CAISO reply comments, which indicated the possibility of studying the full amount at both injection points to accommodate this rare situation. Although the dashboards include only one location to prevent double counting, CPUC staff note that a single injection point has not been selected for the purposes of the TPP base case assessments.” (Page 69 of the February 11, 2021 Final Decision Attachment A.)

SWPG believes the CAISO has confirmed this during its February 25, 2021 meeting on the draft study plan, but regardless is filing these clarifying comments in part due to verbal comments during the call by one or more other stakeholders indicating that the Commission had found constraints related to out-of-state wind injections to the Riverside Palm Springs area which would render the wind imported to that region to be more expensive for buyers. SWPG believes this to not be the case, that instead the RESOLVE model satisfied the transmission constraints and still sited 1,062 MWs of out-of-state (OOS) wind for delivery to the Riverside Palm Springs area.

Quite simply, SWPG encourages the CAISO to continue to study all viable sources for OOS wind delivery (e.g., to Riverside Palm Springs and to Eldorado areas) and to ensure that interties associated with each of the various locations of OOS be equipped to import such wind without significant constraints to importing and delivering to load centers. SWPG appreciates the CAISO's willingness to study both injection regions in its 2021-2022 Base Case and looks forward to the results of the study process.