



## **Comments of American Clean Power – California (ACP-California) on the January 25, 2023 Transmission Development Forum**

February 08, 2023

### **Introduction**

ACP-California greatly appreciates the work that the California Independent System Operator (CAISO), the California Public Utilities Commission (CPUC) and the Participating Transmission Owners (PTOs) have put into organizing and holding the ongoing Transmission Development Forums. As we have stated in prior comments, the status updates and materials provided at these forums gives much needed insight for generation developers who are seeking to bring clean energy resources online and ACP-California strongly supports the continuation of these meetings.

ACP-California also thanks the CAISO, along with the PTOs, for agreeing to report on the aggregate capacity (MW) of resources in the queue which are dependent on network upgrades or transmission projects. We look forward to reviewing that information when it is available. This information should help generators better understand the prioritization of individual projects by the PTOs and will also provide useful information to the CPUC and other interested parties.

While these forums have been an essential venue for communication and insight into project status and reasons for delays, ACP-California maintains its request to better understand the reasons for reprioritization of projects by PTOs. Moreover, the expanding backlog of transmission projects remains a challenge for generation developers and ,given the ongoing challenges and continued delays, ACP-California believes it would be appropriate to explore creative ideas to ensure projects come online in a timely manner.

ACP-California offers the following comments and suggestions for continued improvement in the information provided at the Transmission Development Forums, as well as some suggestions on how to approach transmission projects to avoid delays and get the clean energy projects the state needs online in a timely manner.

### **More Transparency into Reprioritization Decisions & on Remedial Action Schemes (RAS) Would be Helpful**

As more projects are delayed on account of reprioritization, ACP-California reiterates its request for additional transparency on these internal prioritization processes by the PTOs. At the January 25<sup>th</sup> forum, it yet again became clear that reprioritization could be triggered by a number of reasons, including wildfire mitigation, supply chain issues, and budgetary



constraints. Knowing the specific reasoning employed by the PTOs in their decisions for reprioritization and sequencing will help stakeholders either provide solutions for those delays or find alternatives.

Additionally, it appears that the status of implementing older RAS may not be being reported on in the Transmission Development Forum meetings and associated documentation. It would be helpful for the PTOs to ensure that RAS which required under interconnection agreements are consistently being included in the documentation for these forums.

### **Delays Could be Mitigated by Increased Competition**

The increased number of project delays due to reprioritization illustrates the challenge to managing the development and construction of transmission projects and network upgrades. As has been discussed, there are certainly creative ways to manage and prevent these delays – whether they be due to budgetary limitations or supply chain disruptions. Rather than letting these delays persist, ACP-California encourages the PTOs start to consider alternative options for these upgrades, including but not limited to expanded competitive solicitation, to ensure that projects move forward. Competitive solicitation for an expanded number of projects under the CAISO tariff seems to be a simple solution when the PTOs are stretched too thin. Moreover, it is a solution which could provide benefits not only in terms of the timeline of bringing transmission projects online, but also has the potential to offer additional ratepayer savings. While there may be opposition, expanding the suite of transmission projects/upgrades that are eligible for competitive solicitation is an avenue worth exploring as we face situations, on a persistent basis, in which the PTOs are unable to complete upgrades in a timely manner.

### **Conclusion**

ACP-California reiterates its support for the Transmission Development Forums, and especially thanks CAISO, the CPUC, and the PTOs for the work put into these to make them successful. We appreciate the opportunity to provide comment and look forward to further dialogue in the future as we identify the most critical upgrades and enable new capacity to support RA requirements and overall reliability of the system. We also hope to explore additional avenues to expedite transmission project completion, such as expanding the types of projects that qualify for competitive solicitation under the CAISO tariff.