



Comments on July 25, 2023 Stakeholder call discussion CAISO Transmission Development Forum Q3 2023 Reports

Comments Due Aug 8, 2023

Comment period

July 25, 2023, 08:00 am – Aug 8, 2023, 05:00 pm

Submitting organizations

- California Public Utilities Commission - Public Advocates Office

California Public Utilities Commission - Public Advocates Office

Contact

Jerry Melcher (jerry.melcher@cpuc.ca.gov)

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 Transmission Development Forum (Forum) held on July 25, 2023 .

On July 25, 2023, the California Independent System Operator (CAISO) held its quarterly Forum 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

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

Company (SCE), San Diego Gas & Electric Company (SDG&E), and Pacific Gas and Electric Company (PG&E).

The Forum is intended to provide increased transparency and public awareness of ongoing transmission development timelines, and to facilitate the timely identification of technical and project scheduling issues. Proactively resolving these issues can help reduce avoidable added project costs and mitigate scheduling delays for needed transmission additions.

The Forum workbooks generally 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 Forum workbooks include 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 to be included in the Forum workbooks.

A Comprehensive Forum is Needed

Currently, the Forum workbooks and Forum quarterly meetings address only a subset of the individual Participating Transmission Owner's (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. Cal Advocates recommends that at least one of the quarterly Forums include a discussion of the totality of each PTO's outstanding projects and its plan and schedule for completing its projects in a timely fashion. This "big picture" review would help the CAISO and stakeholders understand the magnitude of any backlogs, reasons for delays, plans to address delays, and any other problems with constructing a project.

TPP Should Incorporate the Status of Projects in the Forum

Cal Advocates recommends the CAISO reevaluate the need for previously-approved transmission projects that have been severely delayed. For example If a project was found to be necessary by CAISO a some time ago and is still not built or scheduled, the need for the project should be reevaluated under current conditions. If such projects were approved and are still not online while the grid has been undergoing continual build out, it is unclear if the project is still needed

as the prior need may have already been addressed by another project that is already constructed. If the project is no longer needed, its construction may lead to stranded assets.

Cal Advocates recommends the CAISO re-evaluate previously approved TPP projects including PG&E's 15 long delayed projects that were approved prior to the 2012-2013 TPP.² If CAISO finds that the need for these projects has diminished, these projects should be eliminated. This type of critical analysis could reduce both cost impacts to ratepayers and PG&E's current backlog of more than 100 transmission projects.

Likewise, before adding to its backlog with this year's TPP approved projects, the CAISO 2023-2024 TPP should take into consideration PG&E's massive backlog of CAISO approved transmission projects that are delayed or pending operational status. CAISO should consider market alternatives such as having independent contractors bid in a competitive solicitation all approved projects in work assigned PG&E's territory within the context of its tariff to help alleviate PG&E's problem.

Improve Transparency

In comments to the previous (05/08/23) Forum for improved transparency, Cal Advocates recommended the CAISO record the Forum and post the recordings on the CAISO Forum webpage, consistent with its practice for other CAISO stakeholder engagement initiatives and workshops. The Forum provides important information and a key engagement platform for external stakeholders. CAISO has demonstrated that there is no technological or logistical barrier to recording and publishing other workshops or stakeholder engagement events. Therefore, the Forum should be recorded for stakeholders who cannot attend at the specific time and published to inform stakeholders and the public.

The CAISO has previously stated that, given the expectation that documentation from these Forum calls will be referred to in subsequent regulatory proceedings, the Forum 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,

² Per the Forum workbook, PG&E has 15 delayed projects that were approved prior to the 2012-2013 TPP.

Elliot Mainzer, has mentioned on numerous occasions that he seeks to improve the CAISO's transparency.³ Providing archived webinars for the Forum and all other CAISO stakeholder meetings would help advance this goal.

To improve the transparency of the Forum 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.