

# Comments on October 25, 2023 Stakeholder call discussion CAISO Transmission Development Forum Q 2023 Reports

# Due November 8, 2023

**Comment period** October 25, 2023, 08:00 am – 8 November, 2023, 05:00 pm

#### Submitting organizations

California Public Utilities Commission - Public Advocates Office

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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.<sup>1</sup> Cal Advocates provides these comments on the CAISO's Transmission Development Forum (Forum) held on October 25, 2023.

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

<sup>&</sup>lt;sup>1</sup> Public (Pub.) Utilities (Util.) Code, § 309.5.

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 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 in the generator interconnection process. However, only new resource projects that have executed a Large Generator Interconnection Agreement (LGIA) are to be included in the Forum workbooks.

### A. A Comprehensive Forum is Needed

Currently, the Forum workbooks and Forum quarterly meetings address only a subset of the individual PTO's CAISO-approved, but not yet built, transmission and interconnection projects. Specifically, each PTO identifies only 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 includes a discussion of the full scope and status update of each PTO's outstanding projects. The PTO's status update should include 1) its plan and schedule for completing its projects in a timely fashion (i.e., when was the project approved in the CAISO TPP, 2) projects submitted to the CPUC for permitting, 3) the date of final permit approval and, 4) the construction start date and end date (when the project is used and useful). 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 a project.

#### B. 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 substantially delayed. For example, if a project was found to be necessary by CAISO decades previously 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 because 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 reevaluate previously approved TPP projects including PG&E's 15 long delayed projects that were approved prior to the 2012-2013 TPP.<sup>2</sup> If CAISO finds that the need for these projects no longer exists or is no longer compelling, 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. Recent workbooks show that PG&E has 98 network transmission projects and 40 generation interconnection projects under development.<sup>3</sup> CAISO should consider market alternatives such as having independent contractors bid in a competitive solicitation for all approved projects in work assigned in PG&E's territory within the context of its tariff to help alleviate PG&E's backlog of CAISO approved transmission projects needed for grid reliability and policy.

# C. Question for PG&E on Expected Filing Date for projects recently approved by CAISO

For the following projects, Cal Advocates would like to know if PG&E expects to file an application at the CPUC for a PTC, CPCN, or submit a NOC. Also, please provide an anticipated year when these projects will be will be filed at the CPUC, if applicable, or construction will be initiated.

- Elements Removal Project
- Weber-Mormon Jct 60 kV Line Section Reconductoring Project
- Banta 60 kV Bus Voltage Conversion
- Borden-Storey 230 kV 1 and 2 Line Reconductoring
- Equipment Upgrade at CCSF Owned Warnerville 230 kV Substation Manteca #1 60 kV Line Section Reconductoring Project

<sup>&</sup>lt;sup>2</sup> Per the Forum workbook, PG&E has 15 delayed projects that were approved prior to the 2012-2013 TPP.

<sup>&</sup>lt;sup>3</sup> Per the Forum workbooks, Network Upgrades - Generator Interconnection - Oct 25, 2023, Approved Projects - Transmission Planning Process - Oct 25, 2023

- Coppermine 70 kV Reinforcement Project
- Contra Costa PP 230 kV Line Terminals Reconfiguration Project
- Cooley Landing 60 kV Substation Circuit Breaker No #62 Upgrade
- Cortina 230/115/60 kV Transformer Bank No. 1 Replacement Project
- Reconductor Rio Oso-SPI Jct-Lincoln 115kV line
- Atlantic 230/60 kV transformer voltage regulator
- New Collinsville 500 kV substation
- New Manning 500 kV substation
- Manteca-Ripon-Riverbank-Melones Area 115 kV Line Reconductoring Project
- Moss Landing Las Aguilas 230 kV Series Reactor Project
- Reconductor Delevan-Cortina 230kV line
- San Jose Area HVDC 230 kV Line (Newark NRS)
- San Jose Area HVDC 500 kV Line (Metcalf San Jose)
- Series Compensation on Los Esteros-Nortech 115 kV Line
- Table Mountain Second 500/230 kV Transformer
- Vasona-Metcalf 230 kV Line Limiting
- Garberville Area Reinforcement
- Henrietta 230/115 kV Bank 3 Replacement
- Lone Tree–Cayetano–Newark Corridor Series Compensation
- Los Banos 230 kV Circuit Breakers Replacement
- Los Banos 70 kV Area Reinforcement
- Mesa 230/115kV Spare Transformer
- Metcalf 230 / 115 kV Transformers Circuit Breaker Addition
- North East Kern 115 kV Line Reconductoring
- Panoche 115 kV Circuit Breaker Replacement and 230 kV Bus Upgrade project
- Pittsburg 115 kV Bus Reactor project
- Redwood City 115kV System Reinforcement
- Santa Rosa 115 kV lines Reconductoring project
- South Bay Area Limiting Element Upgrade
- Tesla 115 kV Bus Reconfiguration
- Tulucay-Napa #2 60 kV line Reconductoring project

#### D. Question for PG&E on expected CPUC filing.

PG&E reports several expected CPUC filings as "N/A" but does not explain what this indicates. PG&E should please explain what this means.

#### E. Question for PG&E, SCE, and SDG&E about expected CPUC filing date.

PG&E, SCE, and SDG&E report that the expected CPUC filing dates for several projects is either "pending" or "to be determined". These PTOs should be more specific about what they mean by "pending" or "to be determined" as those terms relate to the CPUC filing date and, for each project, indicate if it falls under any of the following project status definitions. If so, which one. If a project does not fall under any of the status definitions below, explain what status the project does fall under.

- 1. The design of the project has not begun.
- 2. The utility has not determined whether it will file at the CPUC for a PTC, CPCN, or seek an exemption.
- 3. The utility has no projected timeline for when it will file at the CPUC.

#### F. Question for PG&E on Reprioritization

The expected in-service date for the following projects was moved up to an earlier expected in-service date due to reprioritization.

- Borden 230/70 kV Transformer Bank #1 Capacity Increase
- Coppermine 70 kV Reinforcement Project
- Metcalf-Piercy & Swift and Newark-Dixon Landing 115 kV Upgrade
- Midway Kern PP #2 230 kV Line (Bakersfield-Kern Reconductor)
- North Tower 115 kV Looping Project
- Ravenswood 230/115 kV transformer #1 Limiting Facility Upgrade
- Reconductor Rio Oso–SPI Jct–Lincoln 115kV line
- Wheeler Ridge Junction Substation

The expected in-service date for the following projects was delayed due to reprioritization.

- Atlantic 230/60 kV transformer voltage regulator
- Clear Lake 60 kV System Reinforcement
- Kern PP 115 kV Area Reinforcement
- Manteca-Ripon-Riverbank-Melones Area 115 kV Line Reconductoring Project
- Moss Landing Las Aguilas 230 kV Series Reactor Project
- Newark-Milpitas #1 115 kV Line Limiting Facility Upgrade
- Salinas-Firestone #1 and #2 60 kV Lines
- South of San Mateo Capacity Increase
- Table Mountain Second 500/230 kV Transformer
- Tyler 60 kV Shunt Capacitor
- Weber-Mormon Jct 60 kV Line Section Reconductoring Project
- Midway-Temblor 115 kV Line Reconductor and Voltage Support

PG&E should explain what factors it considers when making determinations about a project's relative priority in its reprioritization process. It also should explain the specific attributes of the projects listed above that influence whether the project is prioritized or deprioritized.