



Comments on January 29, 2025 Stakeholder call discussion on CAISO Transmission Development Forum H1 2025 Reports

Due February 12, 2025

Comment period

January 29, 2025, 08:00 am – 12 February, 2025, 05:00 pm

Submit comments to: regionaltransmission@caiso.com

Submitting organizations

- California Public Utilities Commission - Public Advocates Office

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Contact

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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.¹ Cal Advocates provides these comments on the California Independent System Operator (CAISO) Transmission Development Forum (Forum) held on October 25, 2023.

On January 25, 2025, the CAISO held its biannual 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 &

¹ Public (Pub.) Utilities (Util.) Code, § 309.5.

Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), LS Power Corporation (LSPC), and Horizon West Transmission, LLC (HWT).

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 biannual Forum presentations and workbooks would benefit from the PTOs providing more transparency on the type and timing of regulatory licensing that will be pursued. As was discussed at the meeting, it was unclear whether a status of “Exempt” reflects that a project required no CPUC permitting at all (including advice letter notice of construction) or that it just meant that the project would not require a CPCN or PTC permit. This information is also specified in Column K in the Network Upgrades Generator Interconnection spreadsheet under heading “Expected CPUC Permit Application” and Column R in the Approved Projects Transmission Planning Process under the heading “Expected CPUC Permit Application Filing.” The data provided in these fields often includes entries such as *TBD*, *N/A*, *Exempt*, and *Pending* with no definitions or descriptions.

In order for stakeholders to effectively track the regulatory status and progress of CAISO approved transmission projects, Cal Advocates recommends that the CAISO and the Transmission Owners update the regulatory status columns to include information that clarifies the specific licensing process that each transmission project will follow, including the type of CPUC filing (whether CPCN, PTC, or Advice Letter), or exemption if warranted, and expected dates for filing.