



June 20, 2022

California Independent System Operator

**California Public Advocates Office’s Comments on the California Independent System Operator’s (CAISO’s) Interregional Transmission Project (ITP) Evaluation Plan Update.**

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) is an independent consumer advocate with a legal 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 has two questions related to the CAISO’s and WestConnect’s June 13, 2022 Presentation on Interregional Transmission Projects (ITPs). These questions expand upon questions that Cal Advocates raised during the presentation.

1. At the June 13, 2022 presentation, CAISO stated that because the SWIP-North Project is entirely within NorthernGrid’s system, it is not a Federal Energy Regulatory Commission (FERC) Order 1000 ITP.<sup>2</sup> The SWIP-North ITP Evaluation Process Plan – posted on both the WestConnect<sup>3</sup> and NorthernGrid<sup>4</sup> websites – states that SWIP-North has sought cost allocation from NorthernGrid. SWIP-North has also applied to the CAISO for approval (and cost allocation) as an economic project.<sup>5</sup>

If NorthernGrid and the CAISO both find that they need SWIP-North, would NorthernGrid and the CAISO be able to apply the Order 1000 cost allocation process for interregional transmission projects to SWIP-North?

2. At the June 13, 2022 presentation, WestConnect described its evaluation plan for the North Gila – Imperial Valley #2 Project (NGIV2). WestConnect also stated that: 1) it has never identified a regional need that has led to the consideration of an ITP, and 2)

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<sup>1</sup> California Public Utilities Code Section ( § ) 309.5.

<sup>2</sup> Interregional Transmission Project Evaluation Plan Update. June 13, 2020. Page 8. Available at <http://www.caiso.com/Documents/Presentation-InterregionalTransmissionCoordination-June132022.pdf>.

<sup>3</sup> Available at <https://doc.westconnect.com/Documents.aspx?NID=19090&d=1>.

<sup>4</sup> Available at [https://www.northerngrid.net/private-media/documents/2020.06.08.NG\\_SWIP\\_N\\_ITP\\_Eval\\_Plan\\_Final.pdf](https://www.northerngrid.net/private-media/documents/2020.06.08.NG_SWIP_N_ITP_Eval_Plan_Final.pdf).

<sup>5</sup> 2021-22 Transmission Plan. CAISO. P. 281. Available at <http://www.caiso.com/Documents/ISOBoardApproved-2021-2022TransmissionPlan.pdf>.

NGIV2 did not request cost allocation from WestConnect.<sup>6</sup> The Imperial Irrigation District in California could share costs with the CAISO; however, the Imperial Irrigation District is not a WestConnect member.

Please explain the possible cost allocation outcomes, if any, of WestConnect's evaluation of NGIV2. If cost allocation of NGIV2 to beneficiaries in Arizona is not considered, what is WestConnect's purpose in evaluating NGIV2?

Please send a response or any questions on these comments to [steven.shoemaker@cpuc.ca.gov](mailto:steven.shoemaker@cpuc.ca.gov) and [david.peck@cpuc.ca.gov](mailto:david.peck@cpuc.ca.gov). Thank you.

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<sup>6</sup> Interregional Transmission Project Evaluation Plan Update. June 13, 2020. Page 11. Available at <http://www.caiso.com/Documents/Presentation-InterregionalTransmissionCoordination-June132022.pdf>.