

In response to request for comments regarding the May 28<sup>th</sup> presentation:

EDF-R appreciates the efforts of the CAISO to develop the Transmission Capability whitepaper and evaluate transmission zones for potential renewable development. Overall EDF recognizes this effort provides valuable guidance to the IRP process and to renewable developers siting new generation resources.

EDF-R has several suggestions to enhance the whitepaper that are detailed in the following bullets.

1. The CAISO indicates in the white paper that the primary resource for the information in the capability estimates comes from the GIDAP studies. The white paper does not address the deliverability methodology (i.e. ELCC?) being used, adding information related to the deliverability methodology could better help the audience understand the system capability.
2. Considering the various resources on the CAISO grid, some are better suited as capacity resources while others are better suited as energy only resources. EDF appreciates that the CAISO takes this into consideration by considering both FCDS and EODS transmission capability levels. However, the CAISO should clarify in the whitepaper why Energy Only resources can only be added incrementally to the FCDS. FCDS status does not grant preference to the transmission system in the market dispatch and therefore the current amount of FCDS resources in a zone should not be a factor in determining the amount of EODS resources that can utilize that transmission capacity in a specific zone.
3. The whitepaper does a nice job of describing the interaction of the zones and how the zones can be nested. Additional information on how the zones are developed and at what would change a zones boundary would be a helpful section in the white paper.
4. The table listing the Transmission Capability estimates is a valuable tool for anyone trying to understand where transmission capacity may be available. The table shows the increased capability and estimated cost of the upgrade. A suggestion to enhance table 2-1 would be to include the in-service date for the upgrade to convey when it could be operational.
5. It is not clear in the whitepaper how the CAISO sequences this study with the GIDAP study and the TPP study. A timeline showing what GIDAP study and TPP study this effort is based on will help the audience assess the outlook in the specific Transmission zones and sub-zones.

Thank you,

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