

November 16th, 2022

Comments—Transmission Development Forum (October 28th, 2022):

Introduction:

EDPR appreciates the opportunity to comment in response to the October 28th Transmission Development Forum and, more generally, all of the effort the CAISO, the CPUC, and the Transmission Owners have put into this evolving forum. Receiving timely information about important transmission and interconnection upgrades allows EDPR to more efficiently commission our renewable energy and storage projects and contribute to California's clean energy and resource adequacy needs in a timely manner.

EDPR has two technical questions following up on the October 28th discussions:

Technical Questions:

1. Phase 4 of the Circuit Breaker work at the Kern substation has been delayed (“reprioritized”) by two years, from 2025 to 2027. This new timeline would equally delay significant amounts of resource adequacy from reaching market in 2025. EDPR greatly appreciates more information on the drivers of these delays and any options for moving the timeline back to the 2025 ISD.
2. With respect to the Gates breaker over-duty issues, the breakers are currently rated at 40kA—prior to the breaker replacement in Q1-2023, what is the breaker duty for each CB 352, 362, 372 (% of 40k)? Even a rough estimate would be helpful/appreciated. For reference, please see project ID # C12P2-PNU-02.

Thank you again for the opportunity to comment.

Sincerely,

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