

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

Rulemaking 20-05-003  
(Filed May 7, 2020)

**REPLY COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON THE PROPOSED DECISION TRANSMITTING ELECTRICITY RESOURCE  
PORTFOLIOS TO THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR FOR  
2025-2026 TRANSMISSION PLANNING PROCESS**

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Dated: February 4, 2025

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**I. Introduction**

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits reply comments on the January 10, 2025 *Proposed Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for 2025-2026 Transmission Planning Process* (Proposed Decision).

First, the CAISO clarifies that responsibilities for transmission siting and permitting are outside of the CAISO’s jurisdiction. Second, the CAISO responds to comments of American Clean Power (ACP), Equinor Wind US LLC (Equinor), and Golden State Clean Energy (GSCE) regarding Commission portfolios in the 15-year planning horizon. Specifically, the CAISO clarifies the Commission will transmit a 15-year mapped portfolio to the CAISO and the CAISO will study the 15-year portfolio; however, the CAISO has the right, but not an obligation, to approve projects in the 15-year horizon.

**II. Discussion**

**A. The CAISO Clarifies that Responsibilities for Transmission Siting and Permitting are Outside of the CAISO’s Jurisdiction.**

Ordering Paragraph (OP) 2 directs the CAISO to study, but not yet approve, transmission to support additional out-of-state wind modeled in the 2024-2025 and 2025-2026 transmission planning process portfolios. Specifically, OP 2 states:

The California Public Utilities Commission (Commission) requests that the California Independent System Operator (CAISO) analyze the transmission needed for the base case portfolio reflected in Ordering Paragraph 1, but not yet trigger the solutions necessary to support out-of-state wind resources on new transmission and in-state wind resources that are beyond of the CAISO balancing area and are specifically identified in the results of the mapping of resources to busbars discussed in Section 5 of this decision. Instead, the Commission recommends that the CAISO conduct the analysis and begin regional discussions about the appropriate siting and potential costs of such upgrades, for further consideration in next year’s Transmission Planning Process.<sup>1</sup>

Although the CAISO supports the overarching directives in OP 2, the CAISO clarifies that responsibilities for transmission siting and permitting are outside of the CAISO’s jurisdiction. These responsibilities generally fall under the purview of the Commission. The Commission should clarify these roles in the Proposed Decision. The Commission should also clarify that “regional,” in the context of this directive, pertains to entities that conduct transmission planning for planning regions and balancing areas outside the CAISO planning area. The CAISO will engage with such entities to identify possible transmission solutions to integrate the out of state wind resources.

**B. The CAISO Has the Right, but not an Obligation, to Approve Transmission Projects in the 15-Year Planning Horizon.**

In opening comments, several parties comment on Commission portfolios in the 15-year planning horizon. ACP states, “the Commission must convey the 15-year busbar mapping results and ‘shall request’ that the CAISO study those needs as the base case for the next TPP cycle.”<sup>2</sup> GSCE “urges the Commission to correct the Proposed Decision to give the appropriate weight and authority to the 15-year base case portfolio, which is needed to provide actionable policy guidance to CAISO for transmission planning.”<sup>3</sup> Equinor states, “Transmitting a 10-year scenario as the base case contradicts the statutory requirements of Section 454.57(e)(1) because

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<sup>1</sup> Proposed Decision, Ordering Paragraph 2.

<sup>2</sup> ACP Opening Comments, p. 4.

<sup>3</sup> GSCE Opening Comments, p. 3.

it does not provide CAISO the statutorily required basis for transmission approvals needed in a 15-year time horizon...”<sup>4</sup>

The CAISO clarifies the Commission will transmit a 15-year mapped portfolio to the CAISO and the CAISO will study the 15-year portfolio; however, the CAISO has the right, but is not an obligation, to approve projects in the 15-year time horizon. The CAISO approves projects in the 15-year horizon on a case-by-case basis, based on need and the time required to develop and build the project.

### **III. Conclusion**

The CAISO appreciates the opportunity to provide reply comments on the Proposed Decision.

Respectfully submitted

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<sup>4</sup> Equinor Opening Comments, p. 3.