

The ISO received comments on the topics discussed at the April 25, 2023 stakeholder meeting from the following:

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Copies of the comments submitted are located on the User Groups and Reoccurring Meetings Page under Transmission Development Forum at:

<https://www.caiso.com/informed/Pages/MeetingsEvents/UserGroupsRecurringMeetings/Default.aspx>

The following are the ISO and PTO’s responses to the comments.

1. Cal Advocates		
No	Comment Submitted	Responses
a	<p>A Comprehensive Forum Meeting is Needed</p> <p>Currently, the Forum Meeting quarterly meetings address only a subset of the individual PTO’s CAISO-approved, but not yet built, transmission and interconnection projects. Specifically, each PTO only identifies a small fraction of its total number of projects to discuss in the Forum Meetings. In addition to the quarterly Forum Meetings, the CAISO should hold a bi-annual or annual discussion of the totality of each PTO’s outstanding projects and its plan for completing its projects in a timely fashion. This “big picture” review would help the CAISO and stakeholders to understand the magnitude of any backlogs and plans, reasons for delays, and plans to address any problems</p>	<p>The intent of the Transmission Development forum meetings are to provide status updates on projects where information has changed from the previous quarterly stakeholder meeting.</p>
b	<p>Transmission Planning Process (TPP) Should Take Notice of Forum Meeting Status</p> <p>In comments to the previous (10/28/22 and 02/08/23) Forum Meeting, Cal Advocates noted that it is critical that CAISO scrutinize the need for previously approved transmission projects that are severely delayed. If a project was found to be necessary by CAISO over a decade ago and is still not built or scheduled, the necessity of the project should be questioned. It is imperative that CAISO re-evaluate project necessity under current conditions. CAISO’s written response was “The assessment of need for facilities is not a part of the scope of the transmission development forum. This question is applicable to the CAISO’s transmission planning process (TPP).” Given that the Forum Meeting process and TPP are both under the umbrella of the CAISO, the TDF staff should regularly communicate the updates from the Forum Meeting process with the CAISO TPP staff. Cal Advocates recommends the CAISO, in this</p>	<p>As indicated the review of project need is assessed in the ISO’s annual transmission planning process. These reviews are undertaken on a case by case process. Please provide comments on specific projects in the annual transmission planning process stakeholder meetings.</p>

	<p>year’s 2022-2023 TPP, should re-evaluate the need for PG&E’s 13 severely delayed projects that were approved prior to the 2011 TPP. If CAISO finds that the need for these projects has diminished, these projects should be eliminated. This critical analysis could provide necessary ratepayer relief and reduce PG&E’s unacceptable backlog of transmission projects. Likewise, the CAISO 2022-2023 TPP should take into consideration PG&E’s backlog of 82 CAISO-approved transmission projects that are delayed or pending operational status before adding to its backlog with this year’s TPP approved projects. CAISO plans to approve 46 transmission projects in the 2022-2023 TPP and 18 of those projects would be assigned to PG&E. CAISO should consider market alternatives within the context of its tariff to help alleviate PG&E’s problem.</p>	
<p>c</p>	<p>Cal Advocates request that the CAISO and the PTOs provide a dashboard of charts that include the following by each PTO:</p> <p>From the Transmission Planning Process spreadsheet:</p> <ul style="list-style-type: none"> - Expected Years to Completion versus Number of Projects - TPP Year Project Approved versus Number of Projects <p>From the Generation Interconnection spreadsheet:</p> <ul style="list-style-type: none"> - Expected Years to Completion versus Number of Projects - Year that the Generation Interconnection was Triggered versus Number of Projects 	<p>The ISO will consider in future TDF cycles potential additional information presented; however the workbook is made available for stakeholders to review and assess themselves the information in formats they individually choose.</p>
<p>d</p>	<p>Timely Response to Stakeholders</p> <p>Cal Advocates appreciates the effort CAISO puts into tracking the transmission development timelines of all the PTOs. Cal Advocates notes that in its most recent Forum Meeting, the CAISO posted its responses to Stakeholder Comments from the February 8, 2023 submissions on April 21, 2023 which was just two days before the quarterly TDF meeting on April 25, 2023. Cal Advocates recommends posting the CAISO response to Stakeholders</p>	<p>The ISO recognizes the concern and continues to strive to improve in this area.</p>

	<p>Comments from the previous TDF meeting at least one week before the upcoming TDF meeting.</p>	
<p>e</p>	<p>Improve Transparency</p> <p>In comments to the previous (02/08/23) Forum Meeting for improved transparency, Cal Advocates recommends the CAISO record Forum Meetings and post the recordings on the CAISO Forum Meetings webpage consistent with its practice for other CAISO stakeholder engagement initiatives and workshops. Forum Meetings provide important information and a key engagement platform for external stakeholders. Forum Meetings should be recorded for stakeholders who cannot attend at the specific time and published to inform stakeholders and the public. CAISO has demonstrated that there is no technological or logistical barrier to recording and publishing other workshops or stakeholder engagement events. The CAISO April 25, 2023 Forum Meeting presentation (page 2) states that given the expectation that documentation from these calls will be referred to in subsequent regulatory proceedings, the Forum Meeting webinars are not recorded. CAISO should provide a more detailed explanation on what regulatory proceedings it is referring to and why a recorded webinar would create a concern. CAISO President and Chief Executive Officer, Elliot Mainzer, has mentioned on numerous occasions that he seeks to improve the CAISO’s transparency.³ Providing archived webinars for the Forum Meetings and all other CAISO meetings would advance this goal. To improve the transparency of the TDF meetings, each of the presenting PTOs should follow the SCE best practice of providing the original TPP target on-line date for projects that are being rescheduled.</p>	<p>As the ISO has previously indicated, stakeholder calls related to the transmission planning process and the transmission development forum are not recorded. The workbooks and presentations by the PTOs are posted along with responses to written comments.</p>

2. CPUC		
No	Comment Submitted	Responses
a	<p>PG&E’s North of Mesa Upgrade alternative recommended by the CAISO</p> <p>The North of Mesa Upgrade project is pending cancellation per the draft 2022-2023 Transmission Plan with the CAISO instead recommending a 95 MW storage facility and spare transformer at the Mesa substation. Can PG&E please clarify if the new in-service date (ISD) presented at the April TDF (10/21/32) is representative of the battery storage project timeline or is it the ISD if the North Mesa Upgrade project were not cancelled?</p>	<p><u>PG&E Response:</u></p> <p>The in-service date presented at the April TDF under the North of Mesa Upgrade project was representative of the original wires solution project if it were not cancelled. In addition, PG&E also notes that CAISO in its board-approved 2022-23 Transmission Plan corrected an error that references the battery size need as 95 MW. The 2020-21 Transmission Plan identified the need as 50 MW and CAISO re-affirmed that the battery size need at Mesa Substation is 50 MW. PG&E’s energy procurement organization is proceeding with procuring the 50 MW battery and CAISO’s 2022-23 Transmission Plan shows the spare transformer with an in-service date by 2032.</p>
B	<p>CE’s Alberhill 500 kV, Victor 230 kV Switchrack Reconfiguration, and Mira Loma 500 kV CB Upgrade</p> <p>The three projects listed above were previously included in the January 2023 TDF but were not mentioned in the April 2023 TDF. The Alberhill project had an ISD of June 2029 “contingent on licensing.” Similarly, the Victor project had been updated with an ISD of June 2025 while the Mira Loma project had an updated ISD of “pending.” Can SCE explain these omissions from the April 2023 TDF and confirm that there are no reportable changes for the three projects</p>	<p><u>SCE Response:</u></p> <p>The Alberhill 500 kV, Victor 230 kV Switchrack Reconfiguration, and Mira Loma 500 kV CB Upgrade projects were included in both the January 2023 TDF and April 2023 workbooks. The TDF presentation decks summarize only the projects with changed in-service date or a major change in status (e.g., New, Cancelled, or Completed). Since there were no changes in the ISD or status between the January TDF and April TDF for these three projects, they were omitted from the April TDF presentation deck but included in the workbook.</p> <p>The workbook “Approved Projects – Transmission Planning Process – Jan 25, 2023” is available here: https://www.caiso.com/Documents/Approved-Projects-Transmission-Planning-Process-Jan252023.xlsx</p> <p>The workbook “Approved Projects – Transmission Planning Process – Apr 25, 2023” is available here:</p>

		https://www.caiso.com/Documents/Approved-Projects-Transmission-Planning-Process-Apr252023.xlsx
<p>C</p>	<p>PG&E’s Reprioritization</p> <p>During the April 2023 TDF, PG&E was asked about the impacts of funding on projects’ status. Can PG&E please confirm that assigning an “initiating” status for a project indicates that necessary funding has been acquired to continue that project? Energy Division requests further explanation given the multiple projects that have experienced delays due to “funding limitations” as described in the Approved Projects List Spreadsheet from the TPP. Energy Division also requests that PG&E provide greater detail explaining “reprioritization” when it is identified as the cause of project delays. In other words, it is reasonable for PG&E to explain what is taking priority over these projects.</p>	<p>PG&E Response:</p> <p>Projects with “initiating” status have not yet been kicked off, meaning upgrades have not triggered for GIDAP or funding has not been secured yet for the current year.</p> <p>Regarding reprioritization, during 2022 – as PG&E updated its plans for 2023, PG&E allocated capital toward public safety and wildfire risk reduction to meet our Wildfire Mitigation Plan commitments, namely, to undergrounding overhead Distribution conductor in our HFTD and to reduce the ignition risk tag volumes as committed in our Wildfire Mitigation Plan Revision Notice. This re-allocation of planned capital and needs on Distribution assets resulted in a reduction of planned Transmission line and Substation work that were implemented during the latter half of 2022 as part of preparing the 2023 work plan.</p> <p>A guiding principle of reprioritization is to enable projects that are in-flight or projected to complete construction in near term or serving a critical customer and generation interconnection, were preserved to the extent practicable to continue to meet timing needs. A balanced reduction in each of the programs was conducted based on risk (impact/consequence and probability of the impact/consequence).</p> <p>PG&E is planning to spend almost half of our overall capital in the next five years on risk reduction efforts including electric system hardening and undergrounding, pipeline replacement, and other work critical to reducing risk. We use a risk-based approach to prioritize our capital spend, addressing the highest risk and customer-centric work first.</p>



		<p>In addition to safety and risk as top priorities in our prioritization framework, criteria tied to state reliability and climate goals is also incorporated in portfolio prioritization. Further, as we buy down more risk within our portfolio through the completion of mitigation efforts, PG&E plans to increase its allocation to customer centric and asset health work, EV enablement, decarbonization and other state reliability and climate goals.</p> <p>In 2022 we put in place significant efforts towards wildfire mitigation. In 2022 PG&E met the target of undergrounding at least 175 miles of conductor and plan to underground 350 miles in 2023.</p> <p>At the same time, PG&E expanded the Enhanced Powerline Safety Settings program and continued higher levels of Vegetation Management as well implementing new wildfire mitigation programs (e.g. Downed Conductor Technology). These efforts also required prioritization in the overall portfolio.</p> <p>A key measure of Wildfire Mitigation effectiveness is the number of ignitions P&GE reports to the CPUC annually. By year end 2022, PG&E observed a 65% reduction in CPUC reportable ignitions compared to pre-EPSS averages. PG&E continues its focus on safety and risk mitigation aligned to our company’s stand on wildfire safety.</p>
d	<p>Additional Information and Updates for Competitively Awarded Projects</p> <p>It is understood that on competitively procured projects, incumbent utilities must coordinate on timing and work scope with the successful sponsors of competitively-bid projects. Energy Division</p>	<p>The ISO is coordinating with the project sponsors of the awarded competitively solicited projects to provide updates in the transmission development forum similar to the incumbent PTOs. Any discrepancies in information provided can be discussed at the transmission development forum quarterly calls.</p>



<p>finds it reasonable that for any in-flight project that was awarded competitively in the TPP, and which fits within the scope of the TDF, both the winner of the competitively procured portion of the project and the incumbent utility that needs to interconnect the project, present jointly on the overall project in the TDF. This will proactively provide clarity on the project and help to assure stakeholders that the project is being implemented in an efficient manner.</p>	
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