

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

1. Cal Advocates	2
2. EDF-Renewables	5

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 is Needed</p> <p>Currently, the Forum workbooks and Forum quarterly meetings address only a subset of the individual Participating Transmission Owner's (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. Cal Advocates recommends that at least one of the quarterly Forums include a discussion of the totality of each PTO's outstanding projects and its plan and schedule for completing its projects in a timely fashion. This "big picture" review would help the CAISO and stakeholders understand the magnitude of any backlogs, reasons for delays, plans to address delays, and any other problems with constructing a project.</p>	<p><u>CAISO RESPONSE</u></p> <p>The details of all projects are included in the workbooks posted on the ISO webpage with each Transmission Development Forum stakeholder call. The intent of the stakeholder calls is to provide updates where project schedules have changed. If stakeholders have questions on any project not presented, where the schedule hasn't changed, these can be raised on the stakeholder call.</p>
b	<p>TPP Should Incorporate the Status of Projects in the Forum</p> <p>Cal Advocates recommends the CAISO reevaluate the need for previously approved transmission projects that have been severely delayed. For example If a project was found to be necessary by CAISO a some time ago and is still not built or scheduled, the need for the project should be reevaluated under current conditions. If such projects were approved and are still not online while the grid has been undergoing continual build out, it is unclear if the project is still needed as the prior need may have already been addressed by another project that is already constructed. If the project is no longer needed, its construction may lead to stranded assets.</p>	<p><u>CAISO RESPONSE</u></p> <p>The need for approved transmission projects are reviewed in the ISO annual transmission process and not in the transmission development forum. Similarly the need for the network upgrades is reviewed in the generator interconnection process.</p>

	<p>Cal Advocates recommends the CAISO re-evaluate previously approved TPP projects including PG&E's 15 long delayed projects that were approved prior to the 2012-2013 TPP. 2 If CAISO finds that the need for these projects has diminished, these projects should be eliminated. This type of critical analysis could reduce both cost impacts to ratepayers and PG&E's current backlog of more than 100 transmission projects.</p> <p>Likewise, before adding to its backlog with this year's TPP approved projects, the CAISO 2023-2024 TPP should take into consideration PG&E's massive backlog of CAISO approved transmission projects that are delayed or pending operational status. CAISO should consider market alternatives such as having independent contractors bid in a competitive solicitation all approved projects in work assigned PG&E's territory within the context of its tariff to help alleviate PG&E's problem.</p>	
<p>c</p>	<p>Improve Transparency</p> <p>In comments to the previous (05/08/23) Forum for improved transparency, Cal Advocates recommended the CAISO record the Forum and post the recordings on the CAISO Forum webpage, consistent with its practice for other CAISO stakeholder engagement initiatives and workshops. The Forum provides important information and a key engagement platform for external stakeholders. CAISO has demonstrated that there is no technological or logistical barrier to recording and publishing other workshops or stakeholder engagement events. Therefore, the Forum should be recorded for stakeholders who cannot attend at the specific time and published to inform stakeholders and the public.</p> <p>The CAISO has previously stated that, given the expectation that documentation from these Forum calls will be referred to in</p>	<p><u>CAISO RESPONSE</u></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>

<p>subsequent regulatory proceedings, the Forum 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 and all other CAISO stakeholder meetings would help advance this goal. To improve the transparency of the Forum 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>	
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2. EDF-Renewables		
No	Comment Submitted	Responses
a	<p>IC Project Financing</p> <p>EDF-R appreciates PG&E opening the discussion for PTOs to consider accepting material support from the IC if it mitigates a project delay. PG&E's proposal appears to be limited to ICs providing some kind of funding to support transmission upgrades. EDF-R requests for PG&E to also consider other opportunities. For example, in the past EDF-R has offered to procure delayed equipment through its own contracts and contacts to mitigate a delayed milestone and the PTO rejected the offer. EDF-R seeks to partner with the PTO in solutions for these types of issues. EDF-R requests PG&E to provide more information for public discourse on the topic to foster engagement and dialogue with ICs.</p>	<p><u>PG&E RESPONSE</u></p> <p>PG&E appreciates the willingness of EDF-Renewables to look for opportunities to support PG&E and other PTOs with the current supply chain issues the industry is experiencing.</p> <p>PG&E is open to discussions with EDF-Renewables and other resource developers for support with procuring delayed equipment. PG&E maintains certain requirements and protocols for qualifying equipment suppliers. PG&E's supplier qualification process entails multiple steps, such as equipment technical and type test review, third-party cybersecurity review, and supplier quality audits, to qualify an equipment supplier and ensure their product(s) meets all PG&E and industry safety and reliability standards. Ultimately, any assistance with procuring delayed equipment would need to be from one of PG&E's approved equipment suppliers.</p>
B	<p>TPP-approved GLW/VEA Area Upgrades Project</p> <p>EDF-R seeks clarification on the GLW/VEA Area Upgrades project ISDs. The TPP-approved GLW/VEA Area Upgrades project encompasses a revised scope, excerpt below. GLW/VEA was not present at the Q3 2023 Transmission Development Forum, and the CAISO staff indicated they did not expect GLW/VEA to attend the next forum barring major information updates. Although with the revised scope, associated CAISO queued projects likely do not need all the individual components listed below to achieve their respective ISD/COD. EDF-R request for GLW/VEA to</p>	<p><u>GLW RESPONSE</u></p> <p>GridLiance West LLC (GLW) appreciates the opportunity to clarify the TPP-approved GLW/VEA Area Upgrades Project status. The scope associated with GLW within the 2021-2022 TPP, then modified in 2022-2023 TPP of the GLW/VEA Area Upgrades is intended to be grouped into a single project and will have the same corresponding ISD. The CAISO targeted ISD for GLW's scope is 12/31/2027, and currently, the project is on schedule to meet the target ISD. GLW will continue to attend future Transmission Development Forum</p>

<p>provide ISD status updates broken down by each component, or grouped components if they are intended to achieve the exact same ISD. This will help ICs to better monitor the progress on their project specific upgrades.</p> <p>The recommended revised scope of the GLW/VEA Area Upgrades project scope is as follows:</p> <ul style="list-style-type: none"> • Install a new Trout Canyon 500 kV bus and three 500/230 kV transformers at Trout Canyon; • Rebuild Trout Canyon – Sloan Canyon 230 kV DCTL lines to 500 kV DCTL lines; • Rebuild Northwest – Desert View, Pahrump – Gamebird and Gamebird – Trout Canyon 230 kV to double circuit lines; • Rebuild Innovation – Desert View 230 kV No.1 line with a normal rating of 1,154 MVA and an emergency rating of 1,578 MVA; • Install a second Innovation – Desert View 230 kV line; • Rebuild Innovation – Pahrump 230 kV line; • Add a 500/230 kV transformer at Sloan Canyon and loop in the Harry Allen – Eldorado 500 kV line; • Install a 138 kV phase shifter at Innovation on the planned tie-line to NVE; and • Upgrade VEA’s 230/138 kV Amargosa transformer 	<p>meetings and will keep the CAISO and all relevant stakeholders updated on status updates of the ISD as the project progresses.</p>
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