

The ISO received comments on the topics discussed at the January 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. American Clean Power - California		
No	Comment Submitted	Response
a	<p><b>More Transparency into Reprioritization Decisions &amp; on Remedial Action Schemes (RAS) Would be Helpful</b></p> <p>As more projects are delayed on account of reprioritization, ACP-California reiterates its request for additional transparency on these internal prioritization processes by the PTOs. At the January 25th forum, it yet again became clear that reprioritization could be triggered by a number of reasons, including wildfire mitigation, supply chain issues, and budgetary constraints. Knowing the specific reasoning employed by the PTOs in their decisions for reprioritization and sequencing will help stakeholders either provide solutions for those delays or find alternatives.</p> <p>Additionally, it appears that the status of implementing older RAS may not be being reported on in the Transmission Development Forum meetings and associated documentation. It would be helpful for the PTOs to ensure that RAS which required under interconnection agreements are consistently being included in the documentation for these forums.</p>	<p>The following responses have been provided by the PTOs to the comment:</p> <p><b>PG&amp;E response:</b></p> <ol style="list-style-type: none"> <li>1. See response below Large-Scale Solar Association (#5).</li> <li>2. PG&amp;E is not aware of any Generation impacting RAS schemes that are not included in the TDF spreadsheet. If a RAS upgrade has already been triggered, it will be included. There are no RAS projects that have been triggered that have been reprioritized.</li> </ol> <p><b>SCE response:</b></p> <p>SCE has interpreted that reprogramming a RAS/CRAS for the sole purpose of accommodating a new generator falls outside the scope of the Transmission Development Forum because this does not directly impact other projects and the impacted generator would be informed of that schedule through regular interconnection execution meetings. SCE welcomes specifics of any other RAS/CRAS projects not covered in the posted workbooks.</p> <p><b>SDG&amp;E response:</b></p> <p>SDG&amp;E has managed upgrades to its system to ensure timely interconnections of resources. SDG&amp;E reports on network upgrades, including new and modifications of existing RASs, with impact to generators.</p>
b	<p><b>Delays Could be Mitigated by Increased Competition</b></p> <p>The increased number of project delays due to reprioritization illustrates the challenge to managing the development and construction of transmission projects and network upgrades. As has been discussed, there are certainly creative ways to manage and prevent these delays – whether they be due to budgetary limitations or supply chain disruptions. Rather than letting these delays persist, ACP-California encourages the PTOs start to consider alternative options for these upgrades, including but not limited to expanded</p>	<p>The following response to the comment has been provided by PG&amp;E:</p> <p><b>PG&amp;E response:</b></p> <p>PG&amp;E does not believe modifying CAISO’s criteria for competitive solicitation of transmission projects will achieve the desired outcomes nor is it appropriate.</p>



competitive solicitation, to ensure that projects move forward. Competitive solicitation for an expanded number of projects under the CAISO tariff seems to be a simple solution when the PTOs are stretched too thin. Moreover, it is a solution which could provide benefits not only in terms of the timeline of bringing transmission projects online, but also has the potential to offer additional ratepayer savings. While there may be opposition, expanding the suite of transmission projects/upgrades that are eligible for competitive solicitation is an avenue worth exploring as we face situations, on a persistent basis, in which the PTOs are unable to complete upgrades in a timely manner.

First, based on CAISO's recent competitive solicitation process for four projects approved in the 2021-22 TPP, the process itself can take at least one or more years, depending on the number of projects to be evaluated, number of CAISO resources dedicated, and the number of bidders for each project. In addition, the said solicitation would need to take place before initial project activities such as necessary environmental assessments and permitting, including preliminary engineering, which can be lengthy. Furthermore, if projects were awarded to other project sponsors, the winning bidders, before commencing engineering and construction, would need to coordinate closely with the existing PTO to ensure the project design, as well as all construction and equipment installed will be in accordance with the incumbent PTOs standards to maintain the integrity and reliability of the transmission system. Summing all these necessary components of a competitive solicitation process, it alone may result in at least one to two years from commencing the competitive solicitation until any actual project activities even start, which will not mitigate delays.

Second, the vast majority of the network upgrades identified as part of GIDAP and TPP in PG&E's portfolio are brownfield projects on existing PG&E facilities. Only one of the delayed projects under GIDAP is a greenfield project over 200 kV. It is not clear that CAISO or FERC can require a competitive process for work that may result in another entity owning or conducting projects on a transmission owner's existing assets and within its existing land owned in-fee or rights-of-way.

PG&E also notes that any changes to CAISO's competitive solicitation protocols, even temporary ones, would necessitate a stakeholder initiative to make changes to CAISO's tariff. The tariff changes would then need CAISO Board of Governors approval and afterwards be filed and approved at the Federal Energy Resource Commission. This process can take up to 1+ years.

2. Broad Reach Power (BRP)		
No	Comment Submitted	Response
a	<p><b>Implication of TPP Upgrades Delays Needs to be Communicated.</b> PG&amp;E’s presentation deck described schedules for 14 Transmission Planning Process (TPP) projects. Two showed a modest schedule improvement, 3 showed an In-Service delay of “3+ months”, and 9 projects showed a delay of “6+ months”. Interconnecting generators (Generators, Interconnection Customers, or ICs) do not have cost responsibility for TPP projects but such upgrades are “precursor” upgrades and thus these delays will impact many generation projects to the detriment of grid reliability and the State’s decarbonization goals. CAISO should provide a summary of how the delays will affect interim deliverability of specific projects either as part of a supplemental study or as part of the annual Interim Deliverability analysis. Specifically, CAISO should show the impact of project delays that push In Service past the summer season (i.e., past Q3) in a year, such as the East Shore-Oakland J 115 kV Reconductoring Project and the Morgan Hill Area Reinforcement</p>	<p>As suggested in the comment, the ISO does identify impact on queue projects interim deliverability, if any, within the annual NQC deliverability study. The ISO is not aware of the East Shore-Oakland J 115 kV Reconductoring Project and the Morgan Hill Area Reinforcement having impact on the interim deliverability of any queue project. PG&amp;E does consider impact to queued generation projects as part of the prioritization.</p>
b	<p><b>Generation Interconnection Network Upgrades Are Still Not Being Accurately Shown.</b> PG&amp;E’s presentation summarized schedule changes for 6 Network Upgrade (NU) projects. The NU Generation Interconnection Excel (NU-GI) workbook, PG&amp;E tab, lists 36 additional projects—for a total of 421--and, thus, provides a more complete picture. PG&amp;E has changed the Service Date for no less than 23 GI projects since the first quarterly report released in 1Q2022.2 Of these 23 projects, 7 show a schedule improvement and 16 show a delay in the In- Service Date. The average delay for these projects is 18 months (7 quarters). This is not positive news and the “true” reality is undoubtedly worse as this statistic represents only the change shown since PG&amp;E reported data for first report from 1Q2022. The NU-GI workbook does <i>not</i> show the originally estimated In Service date that is communicated to generators in their Phase 2 reports and interconnection agreements (GIAs). BRP is aware of multiple NU-GI projects, with a total scope in excess of \$100 million, for which PG&amp;E’s current In Service date has been delayed by 8 quarters (30 months). You can’t tell this from the NU GI workbook,</p>	<p>The following response to the comment has been provided by PG&amp;E:</p> <p><b>PG&amp;E response:</b> The Phase 2 Appendix A Report Table 6-1 outlines the narrative on what needs to occur and by when in order to meet the Earliest Achievable date outline in the report. These assumptions and durations shown in Table 6-1 estimate a date on when the interconnection agreement is to be executed. The interconnection agreement execution date is the trigger to set the actual earliest achievable dates for the project. If the interconnection agreement does not follow the timeline outlined in Table 6-1 of the Phase 2 Appendix A report then the actual earliest achievable date will be set based on the timeline followed.</p> <p>PG&amp;E includes the upgrade triggered date for any network upgrades driven by signed interconnection agreements. PG&amp;E notes that the reporting of the trigger year in the workbook needs to</p>

	<p>however. BRP reiterates the request made by others before that PTOs list the original In- Service dates committed to ICs in project GIAs.</p>	<p>be corrected and will fix this by the next transmission development forum.</p>
<p><b>c</b></p>	<p><b>Corrective Action and Mitigation is Required.</b> PG&amp;E’s performance with respect to fulfilling approved NUs has gotten demonstrably worse and PG&amp;E has offered no plan to put itself back on course. These delays and the likelihood of more to come puts generation projects at risk for being unable meet commitments to customers, vendors, and investors. Although the transparency provided in the TDF forums is helpful, CAISO should not consider it sufficient—the potential cost to the state is too great. CAISO should recognize the impact and take the actions listed below (BRP requests that CAISO / PTOs comment on each recommended action):</p> <ol style="list-style-type: none"> <li>1. CAISO should communicate the true nature of these delays to the CPUC and FERC. As noted above, delays should be measured from the timelines communicated in Phase 2 studies or signed GIAs, not simply by the change in estimated In Service initially posted by the PTOs in 1Q2022.</li> <li>2. CAISO should develop performance standards for its PTOs on upgrades committed via the TPP or generation interconnection process. CAISO should consider the ability to engage in enforcement actions or issue penalties when reasonable standards are not met.</li> <li>3. Where the PTO forecasts that it cannot perform (or is demonstrably <i>not</i> performing), third parties should be allowed complete upgrades committed in the TPP or in GIAs. This could be done either by the PTO being required to seek external vendors more aggressively or seek investors/co-owners.</li> <li>4. Where timelines have been extended from the dates originally communicated in the generator’s Phase 2 study or GIA, the PTO should be prohibited from collecting Third Interconnection Financial Security (IFS) prematurely. Per the CAISO tariff, Third IFS is not required until the start of construction. Per the projects listed in the PG&amp;E tab of the GI-NU workbook, 14 projects show a start of</li> </ol>	<p>The timelines in Phase II studies do not have the benefit of knowing when the LGIAs will be executed by the generation developers or if generation project withdrawals will delay the need for the upgrade. The point of this process is to provide constructive information and updates, make improvements where feasible, and not to penalize for delays that have already occurred.</p> <ol style="list-style-type: none"> <li>1. The CAISO hosts the transmission development forum with the CPUC.</li> <li>2. The CAISO coordinates with the PTOs on the approved and generation interconnection network upgrades as set out in the CAISO tariff.</li> </ol> <p>The following responses have been provided by the applicable PTOs as identified:</p> <p><b>3 - PG&amp;E response:</b> PG&amp;E is willing to evaluate alternatives that would allow the market to construct needed upgrades while, for the reasons described in response to ACP-CA, PG&amp;E retains ownership. If a stakeholder has a specific proposal under such a construct, PG&amp;E recommends they reach out via their Interconnection Account Manager or e-mail <a href="mailto:wholesalegen@pge.com">wholesalegen@pge.com</a>. PG&amp;E welcomes opportunities to work with customers and stakeholders on creative solutions.</p> <p><b>3 – SCE response:</b> Many of the project delays are due to external concerns, such as material delays, licensing/permitting delays, or IC delays. Other common issues include outage constraints and lack of highly</p>



construction 24 months or farther in the future. Another 8 do not show an estimated construction start date. Per PG&E's remarks provided at the TDF, projects that do not show a construction start date are still being scoped, and therefore, will unlikely start construction for at least a year. All PTOs, including PG&E should provide in their replies to this comment their specific policy is for requiring Third IFS relative to the start of construction shown in the NU-GI workbook.

5. As a way to alleviate the need for certain PTO projects that have been delayed. CAISO should invite generators to either reduce project size or the requested level of deliverability. In some cases, there may be a "win-win" where the delayed project can be descoped or be recognized as not having a reliability consequence as a result of generator modifications. CAISO should do this in 2023 as part of its annual reassessment process. CAISO is requested to confirm that a 2023 Reassessment will occur even though there was not cluster phase 2 study issued in 2022. A 2023 reassessment can incorporate many significant changes that have occurred in the last year including project dropouts, project downsizes, reductions in requested deliverability, changes to approved NUs via the TPP, and schedule delays as communicated by the PTOs. PTOs are requested to comment on whether the 2023 Reassessment would be beneficial for helping them identify project priorities in the face of scheduling constraints.

specialized workforce. It is unclear how additional entities would mitigate these challenges.

**3 - SDG&E response:**

SDG&E has been meeting the in-service dates of Network Upgrades that have impacts to generators. Where the system upgrades are determined not to cause undue risk (safety and reliability) to the system, such as Stand Alone Network Upgrades, SDG&E allows ICs to build the upgrades. However there is currently no evidence that third parties will be more efficient in building those upgrades

**4 - PG&E**

PG&E follows all applicable CAISO tariff rules. The CAISO tariff allows PTOs to collect the third IFS prior to the scheduled start of construction to secure funding for purchasing long lead-time materials ahead of commencing construction. Section 11.3.2 in Appendix DD of the CAISO tariff provides that PTOs may collect the third IFS by no later than the start of Construction Activities for Network Upgrades or Participating TO's Interconnection Facilities on behalf of the Interconnection Customer, whichever is earlier. Further, CAISO's tariff (Appendix A) defines Construction Activities as "[a]ctions by a Participating TO that result in irrevocable financial commitments for the purchase of major electrical equipment or land for Participating TO's Interconnection Facilities or Network Upgrades assigned to the Interconnection Customer that occur after receipt of all appropriate governmental approvals needed for the Participating TO's Interconnection Facilities or Network Upgrades."

As of late, PG&E has worked with Interconnection Customers on collection of the third IFS for larger projects, and allowed third IFS postings to be staggered to lessen the financial burden. To the extent allowed for by the CAISO tariff, PG&E is willing to work with Interconnection Customers on their third posting.

**4 - SCE response**

SCE collects the Third IFS before the start of Construction Activities, which is a defined term in the GIA, and is collected on the date specified in the GIA's Appendix B, Milestones. If the timelines have



		<p>been extended based on an approved modification request, the Third IFS due date may be deferred, but still collected before the start of the modified Construction Activities date reflected in the amended GIA, Appendix B, Milestones.</p> <p><b>4 - SDG&amp;E response:</b></p> <p>In alignment with the CAISO Tariff, SDG&amp;E collects third IFS posting before the start of Construction Activities which allows for purchase of major electrical equipment or land for PTO IF or NUs. SDG&amp;E starts Construction Activities once: GIA has been signed, it has received a Written Authorization to Proceed (WATP), and ICs posted a 3rd IFS postings.</p> <p>SDG&amp;E encourages ICs to review project milestone table documented in the GIA which outlines the responsibilities of the the PTO and the IC to reach the in-service date.</p> <p>5. The CAISO conducts the reassessments per the CAISO tariff. The CAISO will continue to assess future reassessment timing base upon the schedules of the cluster study processes.</p>
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3. Cal Advocates		
No	Comment Submitted	Response
a	<p><b>A Comprehensive Forum Meeting is Needed</b></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 determines which small fraction of its total number of projects to discuss. What would be helpful for all stakeholders and the public would be 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 presentations primarily provide information on projects that have changes to the in-service date as indicated in the workbooks. Stakeholders have an opportunity to review the TDF workbooks and ask questions about specific projects on the TDF calls.</p>
b	<p><b>Transmission Planning Process (TPP) Should Take Notice of Forum Meeting Status</b></p> <p>In comments to the previous (10/28/22) Forum Meeting, Cal Advocates noted that it is critical that CAISO scrutinize the need for previously approved transmission projects that are severely delayed. We specified that 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 reestablish 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)." Cal Advocates recommends that given that the Forum Meeting process and TPP are both under the umbrella of the CAISO, that it should regularly communicate the results of the Forum Meeting process with the CAISO staff working the TPP process.</p> <p>As Cal Advocates recommended, the CAISO in this year's 2022-2023 TPP, should re-evaluate the need for PG&amp;E's 13 severely delayed projects that were approved prior to the 2011 TPP.2 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&amp;E's unacceptable backlog of transmission projects.</p> <p>Likewise, the CAISO 2022-2023 TPP should take into consideration PG&amp;E's massive backlog of 83 CAISO approved transmission projects that are</p>	<p>The information provided in the TDF is used in the TPP in terms of using the updated expected in-service dates while developing base cases for TPP studies. In regards to re-evaluating need for previously approved projects, the ISO will review need for a previously approved project on a case-by-case basis based on the extent of change in the input assumptions is a particular area and the nature of the project.</p>

	<p>delayed or pending operational status before adding to its backlog with this year's TPP approved projects. CAISO should consider market alternatives within the context of its tariff to help alleviate PG&amp;E's problem.</p>	
<p><b>c</b></p>	<p><b>Timely Response to Stakeholders</b>          Cal Advocates appreciates the effort CAISO puts into tracking the transmission development timelines of all the PTOs. That said, it would be helpful that in the spirit of the CAISO's stated willingness to be open and responsive to stakeholders, that CAISO post replies to stakeholder Forum Meeting comments prior to its hosting of the subsequent quarterly Forum Meeting. Otherwise, stakeholders will not know whether its comments from the previous Forum Meeting were understood and acknowledged.</p>	<p>The CAISO continues strive to post the responses to comments in advance as much as possible to next TDF stakeholder call.</p>
<p><b>d</b></p>	<p><b>Improve Transparency</b>          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 January 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 should explain if and why it is unable to record the Forum Meeting webinars and then work with stakeholders to develop a solution to eliminate whatever barriers, CAISO believes exists (e.g., refrain from providing the specific information that creates the regulatory concern). CAISO President and Chief Executive Officer, Elliot Mainzer, has mentioned on numerous occasions that he seeks to improve the CAISO's transparency. Providing archived webinars for the Forum Meetings and all other CAISO meetings would be a step in the right direction.</p>	<p>The CAISO has decided that stakeholder calls related to the transmission planning process, and also applies to the transmission development forum for discussions on specific transmission projects, will not be recorded as they may be subject of future regulatory proceedings. The transmission development forum provides opportunities for stakeholders to ask detailed questions of the PTOs on the transmission planning process approved and generator interconnection network upgrades during the stakeholder calls. In addition, the CAISO provides opportunity for written comments and responses as are provided in these comment matrices, as well as the workbooks and presentations being posted..</p>

4. Falcon Energy Storage Holdings II		
No	Comment Submitted	CAISO Response
a	On the TDF Call, a stakeholder inquired about eliminating the \$50 million competitive solicitation threshold from the CAISO tariff on a temporary basis to allow market participants the ability to complete work on PG&E's behalf to enhance safety, reliability, and minimize the amount of work that has been delayed. PG&E responded by stating that would likely oppose this. Could PG&E provide more detail on why they would oppose a temporary revision to the tariff that enhances safety and reliability?	<p>The competitive solicitation requirements are established within the CAISO tariff where projects eligible for competitive solicitation include regional transmission facilities (i.e., transmission facilities 200 kV and above) except for regional transmission solutions that are upgrades to existing facilities.</p> <p><b>PG&amp;E response:</b> See response above to American Clean Power – California (ACP-CA).</p>
b	Is PG&E willing to consider and support an alternative to the competitive solicitation that would allow the market to construct needed upgrades while PG&E retains ownership?	<p><b>PG&amp;E response:</b> PG&amp;E is willing to evaluate alternatives to the competitive solicitation that would allow the market to construct needed upgrades while, for the reasons described in response to ACP-CA, PG&amp;E retains ownership. If a stakeholder has a specific proposal under such a construct, PG&amp;E recommends they reach out via their Interconnection Account Manager or e-mail <a href="mailto:wholesalegen@pge.com">wholesalegen@pge.com</a>. PG&amp;E welcomes opportunities to work with customers and stakeholders on creative solutions.</p>
c	Falcon encourages the transmission owners and the CAISO to provide stakeholders with responsive narratives and documents well in advance of the next TDF Call in order to foster a robust discussion. Stakeholders were not provided a reasonable time to review CAISO responses in advance of the prior TDF Call.	<p>The CAISO continues strive to post the responses to comments in advance as much as possible to next TDF stakeholder call.</p>

5. Large Scale Solar Association (LSA)		
No	Comment Submitted	CAISO Response
a	<p>LSA believes that the process would be even more valuable if the PTOs provided deeper insights on the reasons for project delays and how they are prioritizing projects. For example, PG&amp;E pointed to their prioritization strategy as the reason for many of their project delays. When asked about the criteria they use to prioritize projects, PG&amp;E provided a high level list of issues including safety, wildfire mitigation, and supply chain impacts. While LSA agrees that safety must remain the number 1 priority, it is important to understand the types of projects that are being deprioritized and whether the trade-offs are reasonable. In other words, what are the criteria for determining which projects to prioritize? For example, do PTOs consider the state's reliability or climate goals to be safety related? Who makes this decision and what are their motivating interests? LSA is interested in feedback from PTOs that provides this level of detail regarding their prioritization methodology.</p>	<p><b>PG&amp;E response:</b>            Transmission Development Forum stakeholders have requested some transparency into prioritization decisions. During 2022 – as PG&amp;E updated its plans for 2023, PG&amp;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&amp;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</p>



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.

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.

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.

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.

**SCE response:**  
SCE has provided the requested details on project delays, which are typically project-specific and often due to external concerns, such as material delays, licensing/permitting delays, or IC delays. SCE has provided justification where a delay involves trade-offs such as outage constraints or lack of highly specialized workforce.

**SDG&E response:**  
SDG&E works with project developers to ensure interconnection projects are built timely to meet in-service dates as documented in GIAs. Construction scopes and timelines are evaluated for achievability before GIA execution, and during project modification evaluations following developer's request for modification.

<p><b>b</b></p>	<p>Furthermore, LSA notes that the need to prioritize stems from a lack of resources and encourages the PTOs to consider methods for outsourcing work. Multiple parties, including California Public Advocates, questioned whether PTOs had considered seeking support from the market to improve their ability to complete more projects on time. LSA encourages the CPUC, CAISO and PTOs to consider whether this is a viable alternative to delaying the state’s reliability and climate goals.</p>	<p><b><u>PG&amp;E response:</u></b>          See responses above to American Clean Power – California (ACP-CA) and Falcon Energy Storage Holdings II. PG&amp;E notes that it is unclear what is meant by “seeking support from the market to improve their ability to complete more projects on time.” In PG&amp;E’s case, the need to re-prioritize projects is not due to workforce availability issue, but rather the need to address highest priority safety work while managing our overall costs and customer affordability</p> <p><b><u>SCE response:</u></b>          SCE presently leverages contractor resources where needed and appropriate.</p> <p><b><u>SDG&amp;E response:</u></b>          SDG&amp;E has dedicated sufficient resources to help ensure projects are managed to meet schedules.</p>
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6. Westlands Solar Park (WSP)		
No	Comment Submitted	CAISO Response
a	Our comment focuses on PG&E's presentation given our projects in Queue Cluster 8, 9, and 14 are all interconnecting to PG&E-owned high voltage transmission facilities in the Central Valley. Our Cluster 8 projects have CODs in Q3 of this year, and our Cluster 9 projects have CODs in Q1 of 2024. Therefore, we have several projects within a year of reaching commercial operation, and our comment reflects the fact that we have fast-approaching milestones that depend on PG&E to timely construct network upgrades necessary for our interconnection and closely coordinate any timeline change with our team.	<p><b>PG&amp;E</b></p> <p>Comment Noted. PG&amp;E understands the importance of the customer's dependency on some upgrades for reaching full deliverability. Customers do not have to wait for the network upgrades to reach COD even though without these upgrades they could only achieve incremental deliverability when available. PG&amp;E encourages developers to leverage the TDF to request information related to these in-flight projects.</p>
b	Since the beginning of these quarterly forums, PG&E's generator interconnection project team that we interact with has deferred to these forums for updates and insights into network upgrades our interconnecting resources are dependent on, claiming they lack awareness of network upgrade development and are only focused on generator interconnection. However, transmission development forums occur infrequently and lack sufficient detail to answer some questions. Transmission development has a clear impact on generator interconnection, so project teams must be more aware of transmission development.	<p><b>PG&amp;E</b></p> <p>The TDF provides an opportunity to obtain more specific information on network upgrades.</p> <p>Based on developer feedback, in addition to continuing to present on projects that have date changes by 3 months, PG&amp;E recommends presenting on projects with ISDs in the next 12 months as they have the highest likelihood of impacts to customers. CAISO will have to take the lead on establishing any new reporting requirement to ensure all PTOs follow the same rules.</p>
c	In particular, the project team has said they cannot notify us of delays to the in-service date for RNUs we depend on (if such delay occurs) and that we must monitor these quarterly forums. For projects nearing commercial operation, project teams must be aware of transmission delays in real-time so they can provide notice to interconnection customers and manage timelines accordingly. Interconnection customers incur real costs when there are late-stage upgrade delays and must act quickly to limit these costs and manage new timelines with contractors. Combing quarterly updates to spreadsheets cannot be the only way that interconnection customers receive notice of delay, especially when it comes to upgrades that are required for interconnection and that impact project milestones. Although CAISO hosts forums to discuss updates to the spreadsheets, these forums are curiously not recorded and thus interconnection customers cannot be assured access to any information outside of what is provided in the spreadsheets or in written responses to comments provided months after	<p>Please see response to comment 6d below:</p> <p><b>PG&amp;E response:</b></p> <p>Comment noted. PG&amp;E is expecting Developers to bring their questions forward in the TDF process. In addition, RFIs can be submitted to PG&amp;E for review and comment by PG&amp;E for projects that impact a Generator's In-Service.</p>

	<p>the forum. This lack of access is problematic, especially when interconnection customers cannot have informed discussions with their PTO's interconnection project team.</p>	
<p><b>d</b></p>	<p>When there is a delay that prevents any GIA milestone from being reached, PTOs are obligated under CAISO's BPM for Generator Management Section 6.2.1.3 to notify CAISO and interconnection customers of the delay regardless of network upgrade type. This notice is required to include a description of the proposed changes, the impact on interconnection customers and generating facilities, and a description of potential alternatives considered. PTO-driven delay is also a meaningful distinction when it comes to the commercial viability criteria. It is not clear to us how this process is supposed to work given that we have not received these types of notices or any details prescribed by CAISO's BPM such as the potential alternatives considered.</p>	<p>In addition to informing of delays through the transmission development forum quarterly meetings, the CAISO will work with the PTOs to provide notification per the CAISO BPM and requirements and within the GIA.</p>
<p><b>e</b></p>	<p>In addition to the need for some mechanism to allow for more frequent and detailed information about transmission delays to provide interconnection project teams up-to-date information, the information provided in the quarterly forums needs to be more specific. PG&amp;E estimates in-service dates by quarter, but our projects have much more specific milestones. Quarterly estimates do not provide sufficient assurance that our projects are still on track. This is especially true when interconnection project teams are not sufficiently aware of network upgrade development, and it creates uncertainty about the milestones in our GIA or as approved in modification requests agreed to by PG&amp;E (and CAISO). We believe that quarterly estimates are reasonable for in-service dates several years out, but for estimates of the next year and sooner, the quarterly estimates provided in the transmission development forum can still create uncertainty for interconnection customers.</p>	<p><b><u>PG&amp;E response:</u></b> PG&amp;E can agree to share the month and year of the expected In-Service within the current year but prefers to align with the CAISO and the other PTOs on this issue.</p>

7. California Public Utilities Commission (CPUC)		
No	Comment Submitted	CAISO Response
a	<p><b>Please be timely in posting the response to stakeholder comments submitted from previous TDF meetings.</b></p> <p>The Energy Division’s FERC Cost Recovery Section supports the comments made by the Public Advocates Office (PAO) and other stakeholders requesting CAISO to be more timely in posting written responses to comments submitted on previous meetings. The last TDF meeting occurred on October 28, 2022 and the response was posted on the morning of the next meeting (January 25, 2023). We believe it is important for the CPUC and other stakeholders to be informed on the stakeholder comments and responses and having them only hours before the next TDF meeting hinders proper collaboration.</p>	<p>The CAISO continues strive to post the responses to comments in advance as much as possible to next TDF stakeholder call.</p>
b	<p><b>Aggregate MW information of interconnection projects.</b></p> <p>Thank you informing the stakeholders on the absence of the aggregate MW information for Q1 2023. It was stated that it will be made available in Q2 2023. Please continue to provide status updates for any changes in preparing and posting this information (particularly if nothing is expected like for Q1 2023).</p>	<p>Comment noted</p>
c	<p><b>Network Upgrades in the generator interconnection process: Please reconsider the decision to only include projects that have an executed Large Generator Interconnection Agreement (LGIA).</b></p> <p>The \$200 million capital cost or greater than 200kV operating threshold for large generator projects excludes a significant portion of projects of interest for the CPUC, and likely for other stakeholders as well. The CPUC understands and appreciates the caveat that CAISO can identify projects of policy significance but an objective but lower threshold for projects to be discussed should be considered.</p>	<p>As indicated below, the PTOs are providing reports on all generation-triggered transmission network upgrades and TPP projects, regardless of financial threshold and size.</p> <p><b>PG&amp;E response:</b> It is unclear to PG&amp;E what the comment is intended to address. PG&amp;E reports on all generation-triggered transmission network upgrades and TPP projects, regardless of financial threshold and size. If a project is in the GIP but it is not triggered, it is not in the presentations, but the complete list of GIP projects is in the workbooks. The intent of the Transmission Development Forum is to have a single forum to track the status of transmission network upgrade projects that affect generators and all other transmission projects approved in the ISO’s transmission planning process.</p>

		<p><b>SCE response:</b>  SCE reports on all generation-triggered transmission network upgrades and approved TPP projects, regardless of financial threshold or operating voltage.</p> <p><b>SDG&amp;E response:</b>  The \$200M and 230kV thresholds identified in the comment are unclear. SDG&amp;E reports on projects with LGIAs that have triggered the Network Upgrades irregardless of the project size and voltage level. The statuses of Interconnection Reliability Network Upgrades (IRNU) that affect Individual projects at the POI level are discussed in detail during project meetings with developers.</p>
<p><b>d</b></p>	<p><b>PG&amp;E Projects Status Summary: Reprioritization</b></p> <p>Of the 20 projects presented in the slide-deck by PG&amp;E, eight (8) were identified as being impacted by “reprioritization.” The FERC Cost Recovery Section requests that the CAISO require PG&amp;E to provide further clarification on driver(s) behind the reprioritization impacting these projects. Stakeholders deserve to understand whether the reprioritization is a PG&amp;E territory-wide policy decision, a CAISO planning driver, or due to other factors. It is a reasonable expectation that stakeholders would receive such explanations on this and other substantial impacts.</p>	<p><b>PG&amp;E response:</b>  See response above to Large-Scale Solar Association.</p>
<p><b>e</b></p>	<p><b>SCE Approved Transmission Planning Projects and Queue Network Upgrades</b></p> <p>Nearly all the 11 projects presented by SCE were delayed from their original expected in-service date (ISD). Of special concern are the projects that were delayed by decades (e.g., Alberhill – 15 years, Method of Service – 18 years) or delayed indefinitely (e.g., Barre, Mira Loma, WOCR CRAS). It is likely that such delays will also result in project cost increases. The FERC Cost Recovery Section requests that the CAISO require SCE to explain to stakeholders what mitigation measures SCE is implementing to avoid further delays and project cost increases. It is a reasonable expectation that stakeholders would receive such explanations on this and other substantial impacts.</p>	<p><b>SCE response:</b>  SCE only provides an update in the forum meeting on projects with a significant status change, which includes new projects, a project initially reaching in-service, or a changed planned in-service date. Information for all SCE projects are available in the workbooks published on the CAISO website.</p> <p>The lack of an expected in-service date for Barre and Mira Loma projects does not indicate an indefinite delay. These projects were newly approved and entered into the work plan, but their schedule was not yet available for the Q1 forum.</p> <p>Project cost is outside the scope of the Transmission Development Forum, but can be addressed through stakeholder engagement in</p>



		<p>the SCE Stakeholder Review Process (SRP). SCE has responded to inquiries on project delays through the SRP, which include the Alberhill 500 kV Method of Service and the Method of Service for Wildlife Substation. The CPUC Energy Division is still actively reviewing the Alberhill Project and is expected to issue a revised staff report soon. SCE is preparing to file an amended application in the next several weeks. The impact of delayed projects is regularly assessed as part of the Transmission Planning Process.</p>
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