

The ISO received comments on the topics discussed at the July 26, 2022 stakeholder meeting from the following:

1. American Clean Power – California (ACP-California).....	2
2. EDF-R.....	4

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 (ACP-California)		
No	Comment Submitted	CAISO Response
a	<p>ACP-California greatly appreciates the work that the California Independent System Operator (CAISO), the California Public Utilities Commission (CPUC) and the Participating Transmission Owners (PTOs) have put into organizing and holding the ongoing Transmission Development Forums. For some time, ACP-California has been raising concerns around, and brainstorming solutions to, the delays that have been occurring to the permitting and construction of transmission facilities necessary to enable new clean generation resources to come online and support Resource Adequacy (RA) requirements. The Transmission Development Forums, and associated spreadsheets and data points provided for these meetings, are an important venue for generation developers to understand the status of upgrades that may affect them, bringing transparency to the process and timelines for projects approved in the Transmission Planning Process (TPP) or included in a signed Large Generator Interconnection Agreement (LGIA). ACP-California supports the continuation of these forums for the foreseeable future, as we collectively seek solutions to the delays in the transmission development process.</p> <p>ACP-California appreciated the updates given by the PTOs at the July 29, 2022 Transmission Development Forum regarding the status of transmission projects, particularly the information about, and reasons for, project delays. The July forum, and previous forums, have helped to increase transparency around transmission development efforts, as stakeholders receive timely updates on the potential for project delays and, in many cases, the reasons for those delays. This information can be helpful in determining whether there are solutions to mitigate delays. And addressing delays is imperative as completion of these upgrades and expansion projects is critical to near-term reliability and long-term decarbonization of the grid. For these reasons and more, the forums should be continued.</p> <p>Below, we provide some suggestions for continued improvement in the information provided at the Transmission Development Forums.</p>	<p>The comment has been noted.</p>
b	<p>Additional Transparency and Information would be Useful in the Future</p> <p>While the information provided during the Transmission Development Forums has been very useful, and we appreciate the incorporation of some of our initial suggestions from comment on the first forum, ACP-California continues to support additional transparency around the how transmission projects are</p>	<p>The reprioritizations were identified primarily in the PG&E projects. PG&E supports additional transparency around the how transmission projects are prioritized and sequenced. In future TDF spreadsheets and presentations, reasons for re-prioritization can be provided.</p>

	<p>prioritized and sequenced by the PTOs. Providing more information on the process used for prioritization of individual projects may help stakeholders better understand the reasons for project delays. That, in turn, will allow solutions for delays to be evaluated and brought forward.</p> <p>ACP-California also reiterates its request that, as part of the Transmission Development Forum spreadsheets, PTOs report on the capacity (MW) of resources in the queue which are dependent on the relevant transmission upgrade/project and whether those resources require the project to interconnect or to achieve deliverability. More granular information on the generation projects that are dependent on these upgrades (without providing project-specific information) would also be incredibly useful. And this information may also help generators better understand the prioritization of individual projects by the PTOs.</p>	<p>The CAISO is working with the PTOs to include aggregate MW of capacity in the queue that are reliant on the approved transmission projects or network upgrades. This information is planned to be included in the January 2023 transmission development forum.</p>
<p>c</p>	<p><u>Conclusion</u> ACP-California reiterates its support for the Transmission Development Forums, and especially thanks CAISO, the CPUC, and the PTOs for the work put into these to make them successful. We appreciate the opportunity to provide comment, and look forward to further dialogue in the future as we identify the most critical upgrades and enable new capacity to support RA requirements and overall reliability of the system.</p>	<p>The comment has been noted.</p>

2. EDF-R		
No	Comment Submitted	CAISO/PG&E Response
a	<p>EDF-R appreciates and supports PG&E's enthusiasm for the forum and encourages all the PTOs to consider the best vehicle to deliver more reactive updates when in-service dates for transmission or related generation projects are close at hand. Perhaps the CAISO can create a standardized format for a notice in the daily briefing, similar to how Business Practice Manual (BPM) Proposed Revision Requests (PRR) statuses are communicated.</p> <p>To that end EDF-R would like to highlight the following two items:</p>	The comment has been noted.
b	<p>EDF-R requests PTOs identify and share potential equipment delays that could impact project's ISD or COD within timeframe that would allow for mitigation to stay on track – in other words, if PTOs make ICs aware of a delay 45 days before ISD not much can be done to accelerate. If this information is shared 6 months in advance there is more that can be done to mitigate the delay.</p>	The PTOs are open to discussions on potential equipment delays with ICs as soon as practical. This type of coordination needs to be on a project-by-project basis between the PTO and the IC.
c	<p>EDF-R requests that PTOs consider accepting material support from the IC if it will mitigate the delay. 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 is seeking to partner in solutions for these issues requests clarification on if this sort of assistance is prohibited for any reason.</p>	The comment has been noted.