

## **LSA Comments on 1/25/2023 Transmission Development Forum**

**Dated February 8, 2023**

The Large-scale Solar Association (LSA) appreciates the opportunity to comment on the Transmission Development Forum (TDF) held on January 25, 2023. LSA commends the CAISO and CPUC for sponsoring the TDF and the PTOs for their extensive participation efforts. The meetings have added significant transparency to the development process.

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&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&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.

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.

LSA appreciates the increased transparency provided by the TDF and looks forward to continued engagement on these issues.