

2018-2019 Transmission Planning Process: Review of Two Draft Special Study Scopes

Submitted by	Organization	Date Submitted
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Please accept these comments on behalf of the Northwest and Intermountain Power Producers Coalition.

NIPPC offers the following comments on the California Independent System Operator's 2018-2019 Transmission Planning Process: Special Study Scopes.

NIPPC recognizes the long history of mutually beneficial seasonal exchanges between the Pacific Northwest and California. NIPPC has long supported fair and competitive markets. NIPPC has also supported regional expansion of organized market structures. Accordingly, NIPPC supports the proposed study as a step towards identifying the new infrastructure and operational processes needed to enhance the flexibility of the transmission system to allow more frequent transfers between California and the Northwest.

NIPPC encourages the study team to consider generation resource additions likely to be added in the Northwest within the study timeframe. NIPPC hopes the study plan will consider renewable energy generation resource additions in the Northwest and resources capable of storing surplus renewable energy generation — specifically pumped hydro and compressed air storage projects.

While the proposed study will help identify the transmission upgrades and operational process enhancements needed to support flexible transfers between California and the Pacific Northwest, NIPPC notes that there will still be policy barriers limiting transfers between the Pacific Northwest and California. Among these policy barriers are carbon accounting, CAISO export fees and BPA's short-term Southern Intertie rates. NIPPC recommends that the policy makers in the Northwest and California begin discussions to identify and eliminate the policy obstacles to increased transfers between the regions.