



## GOLDEN STATE CLEAN ENERGY

March 14, 2022

Ashutosh Bhagwat, Chair  
California ISO Board of Governors

**Re: Board Item 4, 2021-2022 Transmission Plan and 20-Year Transmission Outlook**

Dear Chair Bhagwat and Members of the Board:

Golden State Clean Energy (“GSCE”), the developer of the Westlands Solar Park, appreciates the opportunity to submit this letter in support of the transmission planning items being presented to the Board of Governors on March 17, 2022. The Westlands Solar Park is a 20,000+ acre pre-permitted solar and energy storage master planned project, located in the southern part of the Westlands Water District in California’s Central Valley. The Westlands competitive renewable energy zone was identified in the Renewable Energy Transmission Initiative as an area with the fewest environmental barriers to renewable energy development because of drainage impaired land near existing transmission corridors that can deliver power to all parts of the state.

GSCE supports Board approval of the *Draft 2021-2022 Transmission Plan*. This plan is an important step toward achieving California’s SB 100 policy goals. In particular, the recommended new Manning Substation will help tap the vast potential of renewable development (and likely paired storage) in the Central Valley, a benefit noted in the transmission plan itself at page 199: “The addition of the Manning 500 kV substation will allow for the advancement of renewable generation within the Westlands or San Joaquin area that has been identified with significant least-conflict lands for potential solar development. In addition, within the SB100 analysis, the California Energy Commission has identified this area as having significant potential for solar development for the state to meet its long-term GHG goals.”

New transmission is also needed to increase transmission plan deliverability, a necessary attribute for generation and storage resources to qualify to supply resource adequacy and support grid reliability. The *Draft 2021-2022 Transmission Plan* identifies the Manning Substation as mitigating overloads on the system that limit deliverability of renewable and

energy storage portfolio resources, and we believe that the deliverability benefits from the Manning Substation will allow more resources built in the Central Valley to qualify to supply much-needed capacity for resource adequacy.

We also want to express our appreciation for the ISO's leadership in undertaking a longer-term transmission planning effort by creating the 20-year transmission outlook process. In less than a year since announcing the 20-year outlook process in response to the *2021 SB 100 Joint Agency Report*, the ISO completed its first *Draft 20-Year Transmission Outlook* report, providing a comprehensive assessment of the significant transmission infrastructure needed to meet California's policy goals, including transmission to facilitate renewable development in the Central Valley.

While the initial *Draft 20-Year Transmission Outlook* is a great start, we hope the ISO will now turn to determining how to facilitate the orderly development of least regrets transmission upgrades identified in the *Draft 20-Year Transmission Outlook*. We agree with the comments made in the CEO Report to the Board that the 20-year outlook's findings should be used in ongoing SB 100 processes, and we believe the ISO should promote the 20-year outlook's findings in the CPUC's Integrated Resource Planning process as well. The CEO Report also raises the possibility of additional stakeholder sessions to discuss the outlook's findings, which we believe is important. Within the ISO's own processes, formal linkage between the ISO's annual transmission planning process and 20-year outlook will avoid planning gaps, better support timely development of long lead-time infrastructure, and ensure transmission projects are approved as part of the annual transmission planning process to support the generation needed to meet California's SB 100 goals.

The ISO has shown bold leadership in pushing forward new transmission in the *Draft 2021-2022 Transmission Plan* that will support California with moving towards attaining long-term policy goals. GSCE urges the Board to approve the plan presented by Management. We also encourage the Board to support the work needed to translate the studies in the 20-year outlook process into tangible results, including engagement between the ISO and California's energy agencies. GSCE stands ready to support this process and the actions needed to start building the infrastructure that will provide the backbone for achieving California's SB 100 goals.

Respectfully,

/s/ Daniel Kim

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