



Comments of the San Diego Gas & Electric Company

Transmission Capability Estimates as an input to the CPUC Integrated Resource Plan Portfolio Development White Paper

Upon completion of this template, please submit it to regionaltransmission@caiso.com. Submissions are requested by close of business on June 11, 2019.

Submitted by	Organization	Date Submitted
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SDG&E commends the CAISO for initiating this transparent stakeholder process which was needed to understand one of the main inputs of the CPUC Integrated Resource Plan (IRP) process. SDG&E is also pleased that the CAISO has documented in the white paper the specific assumptions used to derive the CPUC's RESOLVE model transmission capability estimates.

Although SDG&E supports how Full Capability Deliverability Status (FCDS) estimates are derived through the Generation Interconnection Deliverability studies, SDG&E believes that more information is needed to understand and improve the rough estimates made around the Energy Only (EO) components. SDG&E appreciates the CAISO acknowledging that the Energy Only estimates are made using a generalized assumption reflecting that future zero-marginal-cost renewable resources will displace all non-zero-carbon resources and imports within a study area. This is a good starting point that can be further improved with additional efforts such as:

- The CAISO should augment the white paper with a breakdown of how much MW of non-zero-carbon resources and imports are used to come up with the EO components for each transmission zones and sub-zones
- The CAISO should consider leveraging existing assessments or performing an assessment using one of its production cost simulation tools (PLEXOS or GridView) to determine a more accurate count of how much new renewable could displace non-zero-carbon resources and imports.