



Submit comment on Reliability Assessment and Study Updates

2024-2025 Transmission planning process

1. Provide your organization's comments on the preliminary reliability results for the North area:

No comments at this time.

2. Provide your organization's comments on the preliminary reliability results for the South area:

No comments at this time.

3. Provide your organization's comments on the PTO's proposed reliability alternatives (SDG&E, PG&E, SCE, VEA):

No comments at this time.

4. Provide your organization's comments on the high voltage TAC update:

No comments at this time.

5. Provide your organization's comments on the policy assessment update:

In the past, CalWEA expressed concerns about how the CPUC-IRP/CAISO-TPP planning process seems to have been designed to avoid major policy transmission upgrades, including our concern that the busbar mapping process pushed IRP-determined zonal resources to areas that avoid truly needed policy upgrades. We are pleased to have observed improvements in recent TPP cycles, which have led to CAISO's determination and approval of several badly needed major policy upgrades, particularly in Southern California.

The CPUC's adopted portfolio that serves as the basis for the 2024-25 TPP cycle and the resultant busbar mapping process continue to show improvements that CAISO should act upon to identify and adopt policy transmission upgrades that are badly needed in the North of Greater Bay Area (NGBA) and East of Pisgah (EOP) TPP study zones, as follows.

NGBA

In the previous TPP cycle, the CPUC's portfolio included offshore wind resources in the Humboldt offshore wind call area within the NGBA which led to CAISO's determination and approval of major

policy upgrades in NGBA as part of its 2023-24 TPP. These upgrades consisted of two 500-kV lines both emanating from a new Humboldt 500-kV Substation, one to the existing Fern Road 500-kV Substation and the second to the newly planned Collinsville 500-kV Substation. CalWEA was surprised that the new 500-kV line from Humboldt to Collinsville had stopped at Collinsville, as opposed to continuing the extra few miles to the Tesla 500-kV Substation, because the Collinsville Substation has become the bottleneck for deliverability capacity when considering all northern transactions to the Bay Area, including the planned upgrades for Humboldt offshore wind.

The CPUC's adopted portfolio that serves as the basis for the 2024-25 TPP cycle identified significant onshore wind capacity in Northeast California east of the Fern Road Substation. These resources were identified as FCDS resources, which should lead to needed 500-kV transmission upgrades from the Fern Road Substation to the wind resource areas in Northeastern California, allowing for the future growth of wind, as well as solar and geothermal resources in the area. In addition, it could include interconnection to NVE's Greenlink Project, bringing benefits to CAISO and the WECC transmission system.

CalWEA therefore urges CAISO to consider the following three policy upgrades as part of its 2024-25 TPP process:

- A new 500-kV line from the Fern Road Substation to Northeastern California, with potential future interconnection to NVE's Greenlink Project;
- A new 500-kV line from the Collinsville substation to the Tesla substation
- An upgrade of the existing transmission line from Fern Road to Collinsville or the Tesla substation.

EOP:

Many major renewable energy and storage resource developers have been seriously pursuing large-scale resource development in EOP area due to the developable resource potential in this area combined with the fact that the resource area was included in the CPUC's resource portfolios. This led CAISO to identify the Trout Canyon to Lugo 500-kV policy upgrade and its recommendation to the CAISO board as part of the proposed 2022-23 TPP. Unfortunately, the approval of this upgrade was postponed. This resulted in many commercially viable renewable energy and storage projects in the EOP area to become stranded in the CAISO queue. For unknown reasons, and with the same FCDS resources still in the CPUC's EOP portfolio, CAISO decided that it would not recommend this upgrade to its board as part of the 2023-24 TPP.

The CAISO's 2024-25 TPP September 24, 2024, presentation shows even more significant quantities of renewable energy and storage resources in EOP as well as out-of-state wind:

- 8,399 MW of FCDS renewable and storage resources, and
- 9,964 MW of total renewables and storage resources.

Given the quantity of EOP FCDS resources and zero available deliverability capacity for EOP, we urge CAISO to reconsider the Trout Canyon to Lugo 500 kV line upgrade as a policy upgrade and, in addition, ensure that additional policy upgrades are planned as needed to fully accommodate EOP resources.

6. Provide your organization's comments on the economic assessment update:

No comments at this time.

7. Provide any additional comments your organization has on the September 23-24 Transmission Planning Process Meeting:

No comments at this time.