



May 23, 2023

California Energy Commission
Docket No. 23-IEPR-04
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 23-IEPR-04

Re: Comments Following Workshop on the Clean Energy Interconnection – Bulk Grid

Our organizations were pleased to participate in the May 4, 2023, Workshop on the Clean Energy Interconnection – Bulk Grid and greatly appreciate the Commission’s focus on this critically important topic in this year’s Integrated Energy Policy Report (IEPR). Here, we elaborate on some of the most promising ways in which generation interconnections could be expedited – indeed, must be expedited if California is to have any chance of timely meeting its SB 100 goals. Most of these ideas were addressed by at least one of us at the workshop.

Issues Requiring Legislative Authorization

Many of these topic areas are currently being addressed in pending legislation.

- **Eliminate duplicative “need” findings for new transmission.** CAISO now bases its transmission planning process directly on the CPUC’s Commission-approved resource portfolio that is needed to meet the state’s SB 100 goals. The CPUC’s portfolio is developed after consideration, in conjunction with the Energy Commission, of land-use issues and proximity to existing and planned transmission infrastructure. And yet, after the CAISO identifies transmission that is needed to realize that portfolio, the CPUC spends at least another one to three years conducting a second inquiry into whether a proposed transmission project is needed. This is unnecessary, administratively burdensome, and inefficient. In addition, to our knowledge, this duplicative process has never contradicted CAISO’s findings, further demonstrating that it is unwarranted. The elimination of this this duplicative effort should be pursued as it could shave up to three years off the 10-year timeline to construct new transmission infrastructure.
- **Provide CEQA judicial streamlining for all transmission projects needed to achieve SB 100 goals and extend such streamlining to all wind, solar, and storage projects.** SB 7 (Atkins, 2021) made certain qualifying wind and solar projects eligible for

certification by the Governor as “environmental leadership development projects” (ELDP) that are eligible for expedited judicial review of CEQA lawsuits. Projects must be certified before January 1, 2024. This treatment should be indefinitely extended for wind (both onshore and off), solar, and storage projects (including both standalone and paired [hybrid and co-located] configurations) and expanded to include any new transmission infrastructure that avoids state and national parks and is needed to maintain reliability and/or meet the state’s SB 100 goals.

- **Exempt certain grid infrastructure expansions from CEQA review.** Exempting from CEQA review limited types of grid infrastructure could potentially reduce project lead times by several years. Exemptions could be provided, for example, to substations and other facilities that will support the interconnection of, and are reasonably proximate to, a distributed energy project, energy storage project, or renewable generation project that has met all the requirements to proceed to Phase II study of the CAISO interconnection process.

Issues Requiring Action by the CAISO

- **Encourage CAISO to immediately reform its deliverability methodology.** Several assumptions in the CAISO’s methodology are more conservative than those used by other RTOs. The use of overly conservative assumptions, like the N-2 constraint and the evaluation of Secondary System Need (SSN) during the deliverability assessment process, have made it seem that available “deliverability” capacity is insufficient to meet the state’s near-term reliability and SB 100 goals until such time as new transmission capacity is brought online. We believe that this apparent scarcity is in fact driven by the aforementioned conservative assumptions, which, as noted above, are unprecedented among other RTOs in the U.S. Reforming these assumptions could immediately expand the amount of deliverability available in the system, a necessary factor for projects to qualify under the CPUC’s Resource Adequacy program. More broadly, deliverability methodology reform would enable much more efficient use of the grid, lowering the total transmission needs and costs required to meet the state’s SB 100 goals. Identifying and implementing deliverability reforms in the next “Transmission Deliverability Planning” cycle would help enable interconnection for what may be the last group of projects that could be built in time to meet the CPUC’s near-term reliability and clean-energy goals.

Again, we appreciate the Commission’s attention to interconnection-related issues in this year’s IEPR. We believe that eliminating these barriers will be an essential part of achieving California’s SB 100 goals on schedule.

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Sincerely,

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