



**2020-21 Transmission Planning Process**

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to provide comments following the March 11<sup>th</sup> stakeholder meeting on the 2022 Local Capacity Requirements (LCR). Below please finds PG&E's brief comments.

**Clarification and Interpretation of Local Deficiency Estimates**

The CAISO notes that the overall LCR for the Greater Bay Area has increased by 1,211 MW (6353 MW in 2021 and 7564 in 2022) due mostly to a 140 MW (2543 MW in 2021 and 2683 MW in 2022) increase in the San Jose area load forecast. PG&E requests that the CAISO provide details of the methodology used to evaluate deficiency, for example, whether it assumed extra resources in the most effective location within the deficient area. PG&E also requests that in future analyses, the CAISO provides LSEs additional information of the most effective substations at relieving the constraint in the most optimal fashion.

Additionally, the CAISO has also noted in previous LCR reports that a resource deficient area implies that in order to comply with the reliability criteria, load may be shed immediately after the first contingency. PG&E requests the CAISO to confirm, if the additional Greater Bay Area procurement is made and all resources available in the San Jose sub-area are procured, there may still be insufficient resources in the San Jose sub-area to comply with the reliability criteria resulting in load supply at risk under most stressed system conditions.