



2020-21 Transmission Planning Process

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to provide comments following the February 25th stakeholder meeting for the 2021-22 Transmission Planning Process. Below please finds PG&E’s brief comments.

Develop and Conduct Study to Assess In-State Congestion

For a few hours in mid-August 2020 there was not sufficient capacity on the transmission system to both serve load and move imports through California from the northwest to the southwest. PG&E seeks to understand the load levels in which exports cannot be maximized. This is implied in the future year study assumptions in which PG&E is unable to export 4,000 MW to SCE due to future year load levels in our service territory. Therefore, PG&E requests that the CAISO develop and conduct a study replicating the conditions of the August 2020 heatwave to identify at which load levels exports cannot be maximized. Such an analysis will improve the understanding of what the transmission system would require so that imports could flow through California from the North to the South on the highest demand day in the evening peak period while also serving load. Ultimately, information from a study like this would inform policymakers on what is needed to eliminate the risk of rolling blackouts across California. PG&E expects the costs of such upgrades to be high and requests such a study to inform related policy discussions.

CPUC Procurement Mandate

The Administrative Law Judge for the CPUC released a ruling with a CPUC Staff proposal for the replacement system power need between 2024-2026 due to Once Through Cooling and Diablo Canyon Power Plant retirements. The Staff analysis shows there is a total of 7,410 MW of incremental system RA needed by 2026. PG&E would like to better understand how the assumptions of this procurement need is being evaluated in the Transmission Planning Process to ensure that adequate transmission is in place to support the incremental resource integration needs.

Include an Additional Sensitivity Case

The 2021-2022 CAISO Draft Study Plan includes three sensitivity scenarios for the Reliability Study which covers the high CEC load forecast and the high renewables with minimal gas generation scenarios. PG&E recommends adding one more sensitivity scenario to simulate the existing summer setup removal



in year 5 summer peak case (2026 case). The intent of this additional scenario is to evaluate the comprehensive system impact from P1-P7 contingency analysis if these summer setups are removed, as well as to identify the summer setups critical characteristics.