

The CAISO received comments on the topics discussed at the November 7<sup>th</sup>, 2023 stakeholder call from the following:

- A. Bay Area Municipal Transmission Group (BAMx)
- B. Large-scale Solar Association (LSA)
- C. TransWest Express LLC
- D. California Community Choice Association
- E. Fervo Energy Company
- F. rPlus Hydro, LLLP
- G. Six Cities - Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California
- H. California Public Utilities Commission
- I. California Public Utilities Commission – Public Advocates Office
- J. Cat Creek Energy, LLC
- K. City of San Jose and Ava Community Energy Authority
- L. LS Power
- M. Pacific Gas & Electric
- N. Southern California Edison

Copies of the comments submitted are located on the 2022-2023 Transmission Planning Process page at:

<https://stakeholdercenter.caiso.com/RecurringStakeholderProcesses/2022-2023-Transmission-planning-process>

The following are the CAISO’s responses to the comments

## Questions

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**1. Please provide your organization’s comments on the ISO’s proposed recommendation regarding the Southwest Intertie Project – North.**

No	Submitting Organization	Comment Submitted	CAISO Response
1A	Bay Area Municipal Transmission Group (BAMx)	<p>CAISO Needs to Consider That Building SWIP-North to Access Idaho Wind May Not Be Cost-Effective</p> <p>In the November 7th presentation, the CAISO indicated that the \$/mile cost of SWIP-North is comparable to competitively procured transmission projects, such as Harry Allen-Eldorado (\$3.4 M/mile) and Delaney-Colorado River Transmission (\$4.3 M/mile).[2] Although \$/mile is one metric that could be considered to assess expected cost impact, a more appropriate measure is the amount of resources that can be accessed via a given transmission project (i.e., \$/MW or \$/kW-Yr). The California Public Utilities Commission's (CPUC) resource portfolios that are studied in the CAISO TPP use a \$/kW-Yr metric, rather than a \$/mile metric. For example, the latest version of the RESOLVE model used by the CPUC to select Idaho wind resources accessed by the SWIP-North project for developing the draft 2024-2025 TPP portfolios assumes the capital cost of SWIP-North at \$636 million, which translates to \$60/kW-Yr.[3] Given the latest and considerably higher cost estimate of \$1,090 million[4], the transmission cost of SWIP-North translates to \$104/kW-Yr. Even if Idaho Power shares 22.8%[5] of the cost of SWIP-North, the transmission cost burden on the CAISO ratepayers would be \$841 million or \$80/kW-Yr. With these higher costs, RESOLVE does not select a single MW of Idaho wind resources because Idaho's wind resources have become uneconomical relative to the other competing resources. While the situation would be even worse if Idaho Power were not paying a portion of the SWIP-North costs, their proposed participation is not enough to justify proceeding with this project at this time.</p> <p>Idaho Power’s letter to the CAISO, dated November 1, 2023, indicates that they would execute definitive agreements with Great Basin Transmission, the SWIP-North project developer, for an interest in 500 MW of south-to-north capacity only if it finds sufficient Idaho Power benefits to justify the project cost.</p>	<p>The ISO notes that although the CPUC IRP process did not run scenarios with the updated cost assumption for SWIP North, the results discussed on <a href="#">slide 61 of CPUC presentation under the 2023 IRP process</a> imply the general attractiveness of out-of-state wind to meet the state’s GHG and reliability goals.</p> <p>However, based on stakeholder concerns related to SWIP North current cost estimates, the ISO has added an additional condition for pursuing these entitlements to the Board approval request– the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 TPP portfolio decision. If reaffirmed, this will ensure that Idaho wind continues to remain economical relative to other competing resources.</p> <p>The ISO agrees with stakeholder concerns regarding cost impacts including transmission costs and the need to seek the continued endorsement of Idaho wind resources. As described in the response above, the ISO has added an additional condition.</p>

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		<p>The CAISO should take similar steps to safeguard the interest of its ratepayers. BAMx appreciates the potential role of out-of-state (OOS) wind resources in meeting state policy goals. However, the decision to select the Idaho wind resources cannot be made with complete disregard for their cost impacts, including transmission costs. Therefore, the CAISO needs to seek input from the CPUC regarding whether the CPUC will endorse the continued selection of the Idaho wind resources, given the substantial capital cost increase for SWIP-North that was not modeled in the CPUC's initial selection.</p> <p>Idaho Wind Resource Development Accessed By SWIP-North Is Uncertain</p> <p>The viability of the Idaho wind resources that initially were assumed to have been accessed via SWIP-North is uncertain. The CAISO's assessment regarding the California load-serving entities' (LSE) interest in the Idaho wind depended on projects like the 1,050 MW Lava Ridge Wind project developed by an affiliate of LS Power.[6] However, much of the Idaho wind accessed via SWIP-North seems in flux. Idaho Power's generation interconnection queue identifies Lava Ridge's status as Suspended (queue ID 570).[7] Among the remaining currently active 1,629MW of wind resources in Idaho, only 1,000MW is seeking interconnection at the Midpoint 500kV Substation that can be accessed via SWIP-North. In summary, the wind resources that can be accessed via SWIP-North appear to be shrinking, creating a significant risk that SWIP-North could be an underutilized or even stranded asset. BAMx requests the CAISO to thoroughly examine the commercial viability of the Idaho wind resource development accessed via SWIP-North before considering SWIP-North's approval. At a minimum, the CAISO's approval of SWIP-North needs to be conditional on the feasibility and cost-effectiveness of the Idaho wind resources for the CAISO LSEs.</p>	<p>The ISO agrees that the approval of SWIP-North needs to be conditional on the feasibility and cost-effectiveness of the Idaho wind resources for the ISO LSEs and in response to stakeholder concerns related to cost impacts, it has added an additional condition for ISO Board approval related to CPUC reaffirming the need for Idaho wind in the 2024-2025 TPP portfolio decision. The ISO notes that CPUC portfolios for out-of-state wind resources in Idaho are based upon generic wind resources and not specific to any one specific facility such as Lava Ridge.</p>

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<b>1B</b>	Large-scale Solar Association	<p>CAISO intends to seek board approval to jointly control the SWIP North transmission line to accommodate 1,000 MW of Idaho wind required by the CPUC's resource planning efforts. CAISO would share capacity entitlements with Idaho Power, with CAISO customers paying 77.2% and Idaho Power customers paying 22.8% of project costs, based on relative capacity allocation to each party. The CAISO provided the following justification for approving this project:</p> <ul style="list-style-type: none"> <li>a. The CPUC's Integrated Resource Plan portfolios require significant volumes of Idaho Wind, so the CAISO must pursue transmission infrastructure to support these resources;</li> <li>b. SWIP North is the only known transmission project that can provide access to the required Idaho wind resources; and</li> <li>c. Sharing the cost of the projects with Idaho Power will be less expensive than building the project alone.</li> </ul> <p>LSA does not dispute the arguments provided above but notes that CAISO has not explained why the costs of this project – essentially, a trunkline gen-tie for Idaho wind resources – should be recovered in the Transmission Access Charge (TAC) rather than another available mechanism, as described below.</p>	<p>In considering transmission needs necessary to achieve the state's energy policies, as reflected in the portfolios provided by the CPUC to the ISO for transmission planning purposes, the ISO considers options that are available. While merchant options are available and progressing to address some out-of-state needs – and the ISO is supporting those efforts through the development of the SPTO model – there are no such options currently available for meeting the need to access Idaho resources. The ISO's transmission planning process recovers costs for approved transmission solutions through the Transmission Access Charge.</p>
<b>1C</b>	TransWest Express	<p>TransWest Express LLC ("TransWest") appreciates the ISO's efforts to expand the 2022-2023 Transmission Planning Process ("TPP") to include analyzing the need for upgrades beyond the existing ISO-controlled grid to accommodate out-of-state wind resources.[1] The ISO's proposed recommendation regarding the Southwest Intertie Project ("SWIP") ("SWIP Proposal") represents a novel approach to satisfy state, municipal, county or federal policy requirements, including California's energy policy goals.</p> <p>TransWest supports the ISO as it expands its TPP to satisfy these policy requirements. TransWest also supports the</p>	

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		<p>Subscriber Participating Transmission Owner model as an additional opportunity for developers such as TransWest and Great Basin Transmission to become Participating Transmission Owners (“PTOs”) in the CAISO.</p> <p>Clarity by the ISO on the criteria for applying the expanded TPP analysis would greatly benefit stakeholders. For example, throughout the 2022-2023 TPP, including some initial work in the 2021-2022 TPP, the ISO has focused on the commercial viability of Idaho resources through a Request for Information process with California Load Serving Entities (“LSEs”) and the ISO’s continued assessment of the SWIP. However, the TPP has not included similar activities for Wyoming or New Mexico wind resources also included in the TPP portfolios.</p> <p>The complexity of transmission development, which often requires years of development activities with multiple entities including the ISO and other transmission providers, requires adaptive processes consistent with the stated goals of the ISO’s planning procedures. The ISO’s SWIP Proposal reflects these realities and incorporates them appropriately into the TPP to recognize the potential for a “joint regional policy-driven project” that enables cost sharing between multiple entities while meeting resource planning requirements.</p> <p>The ISO’s SWIP Proposal is also unique because it affords Transmission Access Charge (“TAC”) Customers the opportunity to fund transmission capacity expansion outside of the ISO Controlled Grid. This proposal will require Idaho resources to interconnect through the Idaho Power generator interconnection process and use the ISO’s Maximum Import Capability (“MIC”) mechanism to meet the full capacity deliverability status included in the CPUC portfolios. In addition, to meet the Portfolio Content Category 1 requirements, Idaho resources will need to be pseudo-tied to the CAISO Balancing Authority (“BA”). In contrast, other regional transmission projects, such as the TransWest Express Transmission Project (“TWE Project”), would expand the CAISO BA to include remote resources. Given the</p>	<p>The ISO’s assessment of Idaho wind resources and the SWIP North is based on actionable resource portfolios submitted to it by the CPUC for the TPP. While these portfolios included Wyoming and New Mexico wind, transmission developers had already started the process of working with the ISO and developing transmission projects to access Wyoming and New Mexico resources, independent of the ISO’s TPP. This was not the case with Idaho wind resources and hence the ISO’s assessments were focused on Idaho and the potential of SWIP North, the only known public transmission project that can enable the integration of Idaho wind resources. The ISO determined that assuming entitlements on this line is a cost effective opportunity to address planning portfolio resource needs without pursuing new, more expensive construction. The ISO is not expanding the TPP, but is pursuing the assumption of these entitlements to address the resource portfolios evaluated in the TPP.</p> <p>The ISO plans transmission based on CPUC submitted resource portfolios which includes integrating out-of-state resources. This, along with transmission solutions that need to be developed or are already in development and which enable meeting CPUC portfolio requirements are considered for determining transmission planning solutions. These solutions may include expanding the ISO-controlled grid or integrating pseudo-tied out-of-state resources. The ISO may evaluate or pursue these solutions as a component of the TPP, which ultimately requires Board approval and the approval by FERC of any agreement. This particular project required more time for discussion and analysis than the timeline for the approval for the 2022-2023 Transmission Plan in May, 2023 could accommodate, so</p>

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		<p>authorization level of the ISO's SWIP Proposal, TransWest requests that the ISO identify the criteria for consideration in the TPP of transmission solutions that expand non-ISO controlled grid facilities such as the SWIP Proposal. As TransWest understands the circumstances that have led to the current SWIP Proposal, expansion of the ISO-controlled grid to the Idaho resources was not considered in the TPP.</p> <p>In the development of 2022-2023 TPP, the ISO identified an expectation that its competitive solicitation process would be applied to any capacity requirement ultimately found to be needed. As outlined in the stakeholder meeting held on November 7, 2023, the ISO does not plan to conduct a competitive solicitation process for the SWIP capacity. TransWest does not have a specific concern with this approach. However, in the interest of all stakeholders, TransWest requests the ISO provide an explanation of why the competitive solicitation process within the TPP does not apply to the SWIP Proposal.</p> <p>The 2022-2023 Transmission Plan acknowledged that both the SWIP-North Project and the TWE Project would deliver significant quantities of out-of-state capacity into the Harry Allen-Eldorado area. Specifically, both of these transmission projects have identified the ISO's capacity on the existing Harry Allen-Eldorado transmission line as the MIC location for SWIP and the subscriber right location for the TWE Project, respectively. The ISO recognized that the combined impact of these two major project additions on the existing WECC Paths in the area will need to be addressed. This same need was identified by DesertLink in the System Impact Study performed for the TWE Project interconnection to the Harry Allen-Eldorado line. TransWest recently completed the required WECC Path rating review for the interconnection and the ISO has the results of this study work. TransWest requests that the ISO provide an update on its assessment of the combined impacts of the Wyoming and Idaho resources based on the WECC Path review as part of the supplemental 2022-2023 TPP SWIP Proposal.</p>	<p>additional work has been continued as an extension of the 2022-2023 transmission planning process as communicated in May, 2023.</p> <p>The competitive solicitation process is not required for the current proposal under consideration, as it is seeking assumption of entitlements on not only a proposed transmission line but also on an existing transmission line operated by NV Energy. This is in contrast to the process for approving and developing an entirely new 500+ mile transmission line between Idaho and California. Moreover, Idaho Power, a joint capacity off-taker in the current proposal, does not have competitive solicitation requirements for transmission.</p> <p>The ISO through its TPP continues to study CPUC submitted resource portfolios including out-of-state wind resources and will provide updates as required in its draft 2023-2024 TPP which will be released in March of 2024.</p>

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1D	Cal - CCA	<p>The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator's (ISO) proposed recommendation regarding the Southwest Intertie Project (SWIP) North transmission project. CalCCA supports the ISO's exploration of opportunities to partner with other regions on potential transmission solutions to bring renewable resources to California while reducing overall project costs to California ratepayers.</p> <p>CalCCA generally supports the ISO's proposed recommendation to approve the assumption of the SWIP North transmission line as a joint regional policy-driven project, combined with entitlements on the ON transmission line, conditioned upon actions taken by Idaho Power Company (Idaho Power), Great Basin Transmission, LLC, (Great Basin) and the Federal Energy Regulatory Commission (FERC). The ISO must, however, provide transparency around maximum import capability (MIC) availability and the project development process, so that potential off-takers for the generation have the information necessary to make informed procurement decisions that result in the import of out-of-state (OOS) renewables.</p>	<p>The underlying SWIP North facilities will remain in the NV Energy balancing area and be operated by NV Energy, similar to other out-of-balancing area transmission entitlements under the ISO's operational control. Idaho wind resources will be studied as part of the NV Energy interconnection queue with the ISO and Idaho Power conducting affected system studies as required. These resources will be pseudo-tied to the ISO BAA. Additionally, SWIP North can also be used by non-pseudo-tied resources to dynamically schedule in the market. For deliverability of these imports, LSEs contracting with Idaho wind resources will need to be allocated Maximum Import Capability (MIC) at Midpoint in Idaho which is a scheduling point. MIC can also be allocated at Robinson Summit in Nevada which is another scheduling point. The quantity of MIC at these scheduling points may be restricted until such time when the network upgrades internal to the ISO are in-service and MIC is expanded. In the interim and if necessary, an LSE may choose to find MIC at any scheduling point where these resources can and are being scheduled.</p>
1E	Fervo	<p>Fervo Energy Company ("Fervo") appreciates the opportunity to provide its comments on the California ISO's ("CAISO") intent, recommendations and timeline related to the northern segment of the Southwest Intertie Project ("SWIP North") as part of the 2022-2023 Transmission Planning Process. Fervo stands in support of the CAISO's conditional recommendation to assume Great Basin Transmission LLC's ("GBT") entitlements on the SWIP North transmission line as a joint regional policy-driven</p>	<p>The ISO acknowledges these potential additional benefits, but seeks Board approval related to the Idaho wind resources identified in the CPUC portfolios.</p>

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		<p>project, combined with the GBT entitlements on the 500 kV One Nevada Transmission Line (“ON Line”). Fervo recognizes the impetus for assessing the SWIP North project is driven by the inclusion of out-of-state wind resources, from Idaho, in the Integrated Resource Planning process. However, Fervo wishes to remind the CAISO that the regions which the SWIP North will interconnect are rich with geothermal energy potential capable of providing non-weather dependent, clean-firm 24/7 energy. The construction of the SWIP North project will allow CAISO participants to access new, cost effective, resources that can bolster the reliability needs of California. Fervo recommends that CAISO’s recommendation to the Board of Governors acknowledges the importance for Load Serving Entities to request Maximum Import Capability (MIC) allocation at scheduling points along the path (including Midpoint, Robinson Summit, and Harry Allen). The deliverability capability enabled by the SWIP North line will benefit resources beyond out-of-state wind, such as geothermal, that satisfy the California Public Utility Commission’s policy driven resource requirements.</p>	
1F	rPlus Hydro LLC	<p>rPlus Hydro, LLLP supports the proposed integration of the SWIP North transmission line into the CAISO system. rPlus Hydro, LLLP is a subsidiary of rPlus Energies, LLC (“rPlus”), a multiplatform renewable energy development firm. Through its subsidiary White Pine Waterpower, LLC, rPlus is developing the White Pine Pumped Storage project—a 1,000 MW closed-loop pumped hydro energy storage project that will be located near Ely, Nevada. The White Pine Pumped Storage Project will interconnect into the Robinson Summit Substation and has an executed interconnection agreement with NV Energy. Robinson Summit is the southern terminus of the proposed SWIP North line and northern terminus of the existing ON Line.</p> <p>Under the agreements governing transmission rights of the Southwest Intertie Project (inclusive of ON Line and SWIP-North), CAISO would gain transmission access through Robinson Summit and into Midpoint, Idaho. The approval and construction of SWIP North would thus allow for a diversification of the renewable energy resources accessible to both Nevada</p>	The ISO acknowledges the benefits as noted in your comments.



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		<p>and to CAISO. Furthermore, SWIP-North would allow for greater regional access to the capabilities of White Pine Pumped Storage to help integrate renewable resources, including firming, time-shifting and shaping of solar and wind resources, along with enhancing the efficiency of use of new transmission. This, in turn, would increase load-serving reliability using carbon-free energy and lower the cost of transmission to ratepayers.</p>	
1G	Six Cities	<p>The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”) acknowledge the CAISO’s efforts to evaluate potential transmission solutions that may provide reliable and cost effective access to resources out-of-state. At a time when load-serving entities (“LSEs”) in the CAISO are facing unprecedented challenges in accessing capacity resources at a reasonable cost, including resources that can meet the CAISO’s deliverability and import deliverability requirements for resource adequacy (“RA”), the Six Cities support assessment of projects that can mitigate these challenges. At the same time, further evaluation of the SWIP-North project and more comprehensive communications with stakeholders about certain aspects of the SWIP-North proposal would be beneficial. As an initial matter, and as is discussed in the comments submitted on behalf of the Bay Area Municipal Transmission group (“BAMx”), the CAISO’s assessment of the cost of the SWIP-North project relative to its expected benefits may be incomplete and predicated on data that are no longer accurate. As discussed by BAMx, the projected capital costs of the SWIP-North project have increased from an initial cost estimate of \$636 million to \$1,090 million (with the CAISO portion consisting of \$841 million). After considering this change in the project cost, the CPUC’s RESOLVE model does not select Idaho wind resources because they are not economic relative to alternative resources. The CAISO should consider and address in more detail the anticipated cost impacts to CAISO transmission customers (and the corresponding benefits) resulting from inclusion of the SWIP-North in the CAISO’s Access Charge rates, rather than dismissing cost considerations as not relevant in the context of policy-driven projects. At a</p>	<p>Please see the CAISO’s response to BAMx’s similar comments under 1A.</p>

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		<p>minimum, the CAISO should obtain input from local regulatory authorities (“LRAs”), including the CPUC and non-CPUC LRAs, as to whether procurement of resources from Idaho using the SWIP-North line reflects their procurement policies based on the most recent cost data.</p> <p>Second, the Six Cities encourage the CAISO to provide more information about its plans to implement operational control over the entitlement in the SWIP-North line and associated segments (including the segment of the One Nevada or “ON” Line). If the expectation is that LSEs in the CAISO will be procuring wind resources from Idaho based on the capacity provided by the SWIP-North facility, then LSEs will need to understand mechanics of how and how much capacity will be available, including (for example) the details of any pseudo-tie requirements for Idaho wind resources using the SWIP-North line and requirements for and amounts of Maximum Import Capability (“MIC”) to be made available if the SWIP-North line is developed and placed under CAISO operational control. Benefits of CAISO participation in the SWIP-North line may not justify the cost impacts if MIC limitations do not support resource adequacy status for capacity to be delivered over the line or if significant upgrades to existing CAISO grid facilities are necessary to support MIC allowances for Idaho wind resources.</p> <p>Third, the Six Cities encourage the CAISO to facilitate transparency with stakeholders regarding the viability of SWIP-North given uncertainties associated with Idaho wind projects. At this time, the Six Cities understand that one potential Idaho wind resource, the Lava Ridge Project, may have suspended its interconnection process. Are there other projects that are currently under development and that can be accessed via the SWIP-North line in the event the Lava Ridge Project does not proceed? Or is the CAISO basing its decision to move forward with SWIP-North on a “build it and they will come” philosophy? If so, this reinforces the concerns addressed above about potential cost impacts and assumptions. Relatedly, are</p>	<p>Please see the ISO’s response to Cal CCA comments in 1D. Regarding availability of incremental MIC, the ISO is working towards meeting timelines for integrating wind resources from Idaho as set out in the CPUC IRP.</p> <p>The ISO is planning based on submitted portfolios by the CPUC. The out-of-state resources modeled in the submitted CPUC portfolio are generic wind resources and do not specifically point to a particular facility such as Lava Ridge.</p>

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		<p>there any assumptions being made about CAISO entities' use of the CAISO entitlement in the South to North direction, and how do these assumptions relate to the project's expected costs and benefits?</p>	
1H	California Public Utilities Commission	<p>Staff of the California Public Utilities Commission in the Energy Division (CPUC Staff or Staff) develops and administers energy policy and programs to serve the public interest, advise the CPUC, and ensure compliance with CPUC decisions and statutory mandates. The CPUC Energy Division Staff provides objective and expert analyses that promote reliable, safe, and environmentally sound energy services at just and reasonable rates for the people of California.[1] Further, the CPUC Energy Division Staff advocates on behalf of California ratepayers at the Federal Energy Regulatory Commission (FERC), under whose jurisdiction the SWIP North project would fall.</p> <p>CPUC Staff appreciates this opportunity to comment on the Southwest Intertie Project – North (SWIP North) and the inclusion of CAISO's assumption of Great Basin Transmission's (GBT) entitlements and capacity on the One Nevada (ON) Line in the SWIP North. The CAISO's assumption of entitlements will result in significant opportunities for Load Serving Entities to contract for out-of-state wind resources, which has been a consistent part of the Preferred System Plan portfolios that are modeled within the CPUC's Integrated Resource Planning process.</p> <p>CPUC staff generally supports this initiative to gain conditional approval for the CAISO's assumption of entitlements. However, CPUC Staff does seek within these comments clarification about the process under which CAISO is seeking approval, the need for updated documentation, the determination of benefits and cost sharing for this project, as well as the potential for a cost cap, pursuit of Federal Department of Energy (DOE) funding, alternative financing, and the plan for cost recovery to mitigate impact on the Transmission Access Charge (TAC).</p>	<p>Based on stakeholder concerns related to SWIP North current cost estimates, the ISO has added an additional condition for Board approval – the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 TPP portfolio decision. If reaffirmed, this will ensure that Idaho wind continues to remain economical relative to other competing resources.</p> <p>The current project cost estimate of \$1,090 Million which now includes NV Energy's facility interconnection costs, is the capital cost of the project and not annualized adjusted cost. These interconnection studies were only finalized recently and hence were not reflected appropriately in prior estimates along with project cost increases due to time delay in approving this project. Furthermore, the ISO has always indicated that the SWIP North transmission project includes phase shifters, shunt capacitors, and series compensation on the ON line in both its 2021-2022 (page 304 of the <a href="#">Board approved TPP</a>) and 2022-2023 TPP (Page G-72, <a href="#">Appendix G</a> of the Board approved TPP). Project in-service dates are subject to change and developers consider all regulatory and project risks, in addition to CPUC portfolio requirements before estimating revised in-service dates.</p> <p>The ISO strongly recommends that transmission project developers seek federal funding as appropriate. It must be noted here that the ISO, in its role as a Planning Coordinator and in executing its tariff-based planning process, can only provide a supporting role through need affirmation based on its assessments and any studies or analysis it may have completed on a particular transmission solution being developed in response to CPUC submitted resource portfolios. The ISO cannot pursue DOE funding directly as it is not a project proponent in the specific matter of SWIP North</p>

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		<p><i>Has CAISO considered updating sections of the approved Transmission Plan related to SWIP North, including the economic analysis prior to seeking Board approval?</i></p> <p>CAISO management is planning to bring the proposal to the CAISO Board of Governors (Board) at the December 14, 2023 meeting because Idaho Power intends to file a SWIP-related case with the Idaho Public Utilities Commission by the end of 2023.[2] CPUC Staff understands the need for the project to be successful and supports CAISO's collaboration with Idaho Power. At the same time, Staff seeks to better understand the approval of SWIP North after the annual Transmission Plan has been approved, and the lack of updated documentation. The main sources of information about this project are the 2022-2023 Transmission Plan that was approved in May 2023 and a PowerPoint presentation from the November 7, 2023 meeting. Reviewing these two documents alone, Staff found multiple changes:</p> <table border="1" data-bbox="520 846 1192 1138"> <thead> <tr> <th></th> <th>CAISO 2022-2023 Transmission Plan (Approved May 18, 2023)</th> <th>PowerPoint Presentation (November 7, 2023)</th> </tr> </thead> <tbody> <tr> <td>Cost</td> <td>\$636 M (capital, 2020) or \$870 M (adjusted cost, 2022)</td> <td>\$1.09 B</td> </tr> <tr> <td>Upgrades needed to ON Line</td> <td>None</td> <td>Yes</td> </tr> <tr> <td>In-Service Date</td> <td>2025</td> <td>2027</td> </tr> <tr> <td>Pursuit of Dept. of Energy Funding to benefit CAISO TAC ratepayers</td> <td>Yes</td> <td>No, only Idaho Power is pursuing Dept. of Energy funding.</td> </tr> </tbody> </table> <p>These changes were explained in a meeting and in a PowerPoint presentation on November 7, 2023. CAISO should consider updating the information in the 2022-2023 Transmission Plan or providing transparent documentation to stakeholders for consideration prior to submitting SWIP North to the CAISO Board for approval. For example, in Appendix G of the 2022-2023 Transmission Plan, CAISO completed a production cost simulation and described the results of its economic assessment in detail. CAISO explained that the capital cost estimate was</p>		CAISO 2022-2023 Transmission Plan (Approved May 18, 2023)	PowerPoint Presentation (November 7, 2023)	Cost	\$636 M (capital, 2020) or \$870 M (adjusted cost, 2022)	\$1.09 B	Upgrades needed to ON Line	None	Yes	In-Service Date	2025	2027	Pursuit of Dept. of Energy Funding to benefit CAISO TAC ratepayers	Yes	No, only Idaho Power is pursuing Dept. of Energy funding.	<p>From a process perspective, the proposal is being brought forward as an extension of the 2022-2023 TPP, and the ISO is seeking Board approval and ultimately FERC approval of implementation agreements. The addendum to the 2022-2023 requesting Board approval for the proposed recommendation is posted on the Board materials page, for the December 14, 2023 meeting, for review and consideration by stakeholders.</p>
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		<p>initially \$636 million based on the 2020 Interregional Transmission Plan submission to the interregional transmission coordination group.[3] CAISO converted the capital cost to present value annualized cost and then escalated it to the 2022 dollar based on inflation. CAISO estimated the annualized adjusted cost to be \$870 million.[4]</p> <p>Six months later, as described in the PowerPoint from the November 7, 2023, meeting, the cost has increased to \$1.09 billion due to One Nevada Line system upgrades.[5] Specific information is not provided in the PowerPoint about the need for the system upgrades or the details about the upgrades that justify a \$220 million increase in the project costs. Further, it is unclear whether the \$1.09 billion is the capital cost or the annualized adjusted cost. In other words, is the \$1.09 billion estimate calculated in the same manner as the initial \$870 million estimate? Or, is it based on some other estimate? Is the cost increase due solely to the upgrade on the One Nevada Line, or are there any other reasons for the increase? Additionally, Staff seeks more information about the change of in-service date from 2025 in the 2022-2023 Transmission Plan[6] to the 2027 in the November 7, 2023 PowerPoint.[7] Delays should be described in the project documentation upon which the CAISO Board will be basing its vote.</p> <p>Finally, as discussed below, Staff suggests CAISO consider pursuing funding or grants with the Department of Energy (DOE).[8]</p> <p>[1] More information about the CPUC Energy Division is available at: <a href="https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division">https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division</a>  [2] 2022-2023 TPP: SWIP Stakeholder Meeting Presentation, November 7, 2023 at Slide 12.  [3] CAISO 2022-2023 Transmission Plan, May 18, 2023, Appendix G: Production Cost Simulation and Economic</p>	

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		<p>Assessment Detailed Results, p. G-77. CPUC Staff assume that CAISO is referring to the interregional transmission coordination group, but was unable to find the 2020 submission cited here. Information on CAISO’s interregional transmission effort are available: <a href="http://www.caiso.com/planning/Pages/InterregionalTransmissionCoordination/default.aspx">http://www.caiso.com/planning/Pages/InterregionalTransmissionCoordination/default.aspx</a>.</p> <p>[4] Appendix G: Production Cost Simulation and Economic Assessment Detailed Results, p. G-77, differentiating between the estimated \$636 million cost as 2020 dollars and the \$870 million “total cost” as adjusted for 2022 dollars and the price of inflation</p> <p>[5] Slide 11.</p> <p>[6] CAISO 2022-2023 Transmission Plan, May 18, 2023, p. 129.</p> <p>[7] Slide 5.</p> <p>[8] CAISO discussed its intention to pursue DOE funding in the CAISO 2022-2023 Transmission Plan, p. 102, and verbally during the May 18, 2023 presentation to the CAISO Board. During the November 7, 2023 meeting, however, in response to a question from the CPUC Public Advocates Office, CAISO management stated that Idaho Power may be pursuing DOE funding, but CAISO is not.</p>	
11	California Public Utilities Commission – Public Advocates Office	<p>The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides these comments on the proposed funding agreement for the Southwest Intertie Project-North (SWIP-North) and the presentation on the proposed agreement on November 7, 2023. Cal Advocates is an independent ratepayer advocate with a mandate to obtain the lowest possible rates for utility services, consistent with reliable and safe service levels, and the state’s environmental goals.[1]</p> <p><b>Background</b></p> <p>The SWIP-North transmission project is a proposed 500 kilovolt (kV) transmission line that would connect the Idaho Power Midpoint substation with the NV Energy Robinson Summit substation and the existing One Nevada Transmission Line (ON-Line) in Nevada.[2] As proposed, SWIP-North will be</p>	Please see the ISO’s response to BAMx’s similar comments under 1A.

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>approximately 285 miles in length and have approximately 2,100 megawatts (MW) of transmission capacity. NV Energy has already secured entitlements for approximately 1,000 MW of this capacity.[3]</p> <p>SWIP-North Benefit Analysis</p> <p>LS Power, the SWIP-North developer, claims that SWIP-North will have the following benefits.</p> <p>It will improve the transfer capability between CAISO, PacifiCorp, NV Energy, Idaho Power, and Bonneville Power Association.[4]</p> <p>It will increase Energy Imbalance Market benefits.[5]</p> <p>It helps meet west wide renewable portfolio standards (RPS) and greenhouse gas (GHG) goals.[6]</p> <p>It will enhance system reliability for the entire western Grid.[7]</p> <p>Proposed Funding Agreement for SWIP-North</p> <p>As proposed, CAISO would acquire approximately 1,000 MW of transmission capacity entitlements (entitlements) on the SWIP-North and ON-Line in the north to south direction and approximately 500 MW in the south to north direction. Idaho Power would pursue the remaining available 500 MW of entitlements in the south to north direction on SWIP-North. The current project cost estimate is \$1,090 million or \$3.8 million per mile for SWIP-North and the necessary upgrades to the existing ON-Line project.[8] Combined, these projects could provide California 1,000 MW of transmission capacity between the Midpoint substation in Idaho and the Harry Allen substation in Nevada.[9] California already owns transmission capacity between the Harry Allen substation in Nevada and the California transmission system to accommodate 1,000 MW of Idaho wind.</p> <p><b>Concerns</b></p> <p>Cal Advocates supports CAISO's pursuit of options to reduce the costs and risks for new transmission development out-of-state to meet California's clean energy targets. Cal Advocates appreciates that the proposed agreement is contingent upon the Idaho Public Utilities Commission's approval of Idaho Power's</p>	<p>The ISO agrees that the approval of SWIP-North needs to be conditional on the feasibility and cost-effectiveness of the Idaho wind resources for the ISO LSEs and in response to stakeholder concerns related to cost impacts, it has added an additional condition for ISO</p>

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		<p>proposed interest in SWIP-North.[10],[11] Cal Advocates has concerns regarding the capacity proposed for California versus other options that are consistent with cost causation, available wind resources in Idaho, and the lack of a project cost cap. While SWIP-North is permitted, there is still uncertainty on whether the project timing and alignment are the most optimal and cost-efficient for the western interconnection and for California ratepayers.</p> <p><b>Proposed SWIP-North Capacity for California ratepayers</b> As mentioned, CAISO proposes acquiring entitlements on the SWIP-North and ON-Line equal to approximately 1,000 MW in the north to south direction and approximately 500 MW in the south to north direction. During the November 7, 2023 SWIP-North proposal meeting, CAISO confirmed that the proposed project entitlements are based on the proposed Idaho wind procurement in California’s integrated resource planning (IRP) proceeding resource portfolio for study in the 2024-2025 CAISO transmission planning process (TPP).[12] To access Idaho wind, CAISO would need to secure entitlements for only SWIP North and ON-Line capacity in the north to south direction. Thus, it is unclear that there is a need for proposed entitlements for 500 MW of SWIP-North and ON-Line capacity in the south to north direction. For this reason, Cal Advocates requests CAISO explain the reason for this proposed component of the agreement and its benefits to California ratepayers.</p> <p><b>Explore All Possible Funding Partnerships for SWIP-North and the proposed ON-Line upgrades.</b> Evaluate SWIP-North’s Transfer Capacity Benefits for the Northwest and Mountain Regions. Recently, the Federal Energy Regulatory Commission and the Joint Federal-State Task Force on Electric Transmission proposed that transmission planners consider the increased interregional transfer capacity a project provides in their transmission project selection and cost allocation processes.[13],[14] In line with this recommendation, the Department of Energy (DOE) recently determined that under</p>	<p>Board approval related to CPUC reaffirming the need for Idaho wind in the 2024-2025 TPP portfolio decision.</p> <p>The ISO has not identified firm interest by others in acquiring the south to north capacity and would entertain discussions if approached. Notwithstanding, the ISO believes that the South-North entitlements of 500 MW is beneficial. The economic analysis done under the 2022-2023 TPP notes economic benefits related to exports in the South-North direction during oversupply conditions and reducing renewable generation curtailment. Additionally, there is commercial interest from storage developers for use of the South-North entitlements to charge – this interest is in the public domain given their responses to the Nov 7 stakeholder session and the SWIP-specific Request for Expression of Interest (REOI) that was issued last year.</p> <p>The ISO cannot speculate on potential interest from other entities such as BPA and PacifiCorp in the SWIP North transmission project.</p>



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		<p>medium and high growth scenarios there is a need to increase the transfer capacity between the Northwest region where BPA and Idaho are located and Mountain region where Nevada and PacifiCorp are located.[15]</p> <p>With this new requirement and analysis from the federal government, BPA and PacifiCorp may now have a reason to consider SWIP-North to meet their interregional transfer capacity needs. As mentioned SWIP-North could provide transfer capacity benefits to BPA and PacifiCorp per LS Power analysis. SWIP North also has available transmission capacity that could benefit BPA and PacifiCorp that may not be needed to meet California’s clean energy targets.</p> <p>Available Funding from Federal Agencies and or Utilities There are additional funding sources that should be explored for the remaining 500 MW of SWIP-North capacity in the south to north direction. In the 2022-2023 CAISO Transmission Plan, CAISO specified that DOE loan financing or grants are being considered for the SWIP-North’s anticipated “underutilized capacity.”[16] Recently, the Western States Transmission Initiative recommended that the Committee on Regional Electric Power Corporation (CREPC) and the DOE encourage BPA to finance and build additional transmission projects in the western interconnection.[17] Given these potential sources of funding, LS Power should provide an update on its application for DOE funding resources.</p> <p><b>Confirm the Available Wind Resources at the Midpoint Substation in Idaho</b> Cal Advocates notes that in the last five years several significant wind generation projects withdrew or were suspended in Idaho Power’s interconnection queue.[18] For this reason, Cal Advocates requests CAISO confirm the wind capacity that would be available at the terminus of SWIP-North, which is the Midpoint substation, for California Load Serving Entities to purchase should this SWIP-North funding agreement move forward.</p>	<p>Regarding DOE funding, the ISO strongly recommends that transmission project developers seek federal funding as appropriate. It must be noted here that the ISO, in its role as a Planning Coordinator and in executing its tariff-based planning process can only provide a supporting role through need affirmation based on its assessments and any studies or analysis it may have completed on a particular transmission solution being developed in response to CPUC submitted resource portfolios. The ISO cannot pursue DOE funding directly as it is not a project proponent in the specific matter of SWIP North.</p> <p>The ISO plans transmission based on submitted portfolios by the CPUC. The out-of-state wind resources modeled in the submitted CPUC portfolio are generic resources and do not specifically point to a particular facility such as Lava Ridge.</p>

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		<p><b>Lack of a Project Cost Cap</b>            During CAISO's 2021 Transmission Planning Process, CAISO presented only the costs of SWIP-North in its analysis on the costs of accessing Idaho wind.[19] The cost presented was \$636 million in 2020 dollars for SWIP-North only. The current proposal is for California ratepayers to pay approximately \$842 million to access 1,000 MW of Idaho wind through the SWIP-North project and ON-Line upgrades. Given this more than 30% cost increase, Cal Advocates recommends a project cost cap be established prior to final approval.</p> <p><b>Summary of Recommendations and Requests</b></p> <p><b>CAISO Should Explain How California Ratepayers Benefit from Having 500 MW of Transmission Capacity in the South to North direction on SWIP-North and ON-Line.</b>            Cal Advocates requests confirmation that California would benefit from having 500 MW of south to north capacity through</p>	<p>Though the ISO has not specified a cost cap on the overall project or a cap on the Return on Equity (ROE), the ISO will work with GBT to require prudent cost containment measures in a definitive project sponsor agreement.</p> <p>In order to prudently manage any potential cost escalations, the ISO plans, among other provisions, to negotiate a “meet and confer” clause to the definitive agreement should the project costs exceed 10% of the provided project cost estimate. It is expected that GBT will develop a comprehensive risk register and mitigation plans that will be used for the Project based on experience permitting, designing, procuring and constructing similar projects in the West and throughout the U.S., including DesertLink and the ON Line.</p> <p>GBT will be required to apply to become a Participating Transmission Owner (PTO), at which point the ISO Board may evaluate the specific cost-containment measures agreed to by the parties, which would be reflected in the project sponsor agreement filed with FERC. Additionally, one of the conditions for the assumption of the entitlements of the ISO's recommendation is FERC acceptance of GBT's transmission revenue requirement rate structure and TO tariff.</p> <p>Please see above for ISO responses to all the comments described in detail previously.</p>

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		<p>SWIP-North and ON-Line upgrades as proposed. It appears that California may only need transmission capacity between Idaho and California in the north to south direction to meet its clean energy targets by 2035 and 2045.</p> <p>If California ratepayers would not benefit from 500 MW of transmission capacity in the south to north direction on SWIP-North and ON-Line, CAISO should reduce its project participation in the south to north direction accordingly.</p> <p><b>Explore Additional Funding Partnerships for SWIP-North and the proposed ON-line upgrades.</b></p> <p>Transfer Capacity Benefit Evaluation</p> <p>LS Power has also already determined that SWIP North would provide transfer capacity benefits to Bonneville Power Association (BPA) and PacifiCorp. BPA and PacifiCorp may be required to consider SWIP-North for these benefits in their next planning cycle. Cal Advocates supports this additional evaluation to confirm the proposed SWIP-North cost allocation is consistent with the expected benefits to the Balancing Authority Areas in the western interconnection.</p> <p><b>Confirm the Available Wind Resource Capacity at the Midpoint Substation for California.</b></p> <p>CAISO should confirm the wind generation projects in Idaho that will move forward and have available wind capacity for California before approving this proposed SWIP-North funding agreement.</p> <p><b>CAISO Should Require a Project Cost Cap and Project Cost Review similar to practices in Southwest Power Pool.</b></p> <p>Cal Advocates recommends two additional funding agreement contingencies, which are as follows:</p> <p>SWIP-North and the proposed ON-Line upgrades should be subject to a binding project cost cap.</p> <p>SWIP-North and the proposed ON-Line upgrades should be subject to a project cost review to ensure ratepayers are only obligated for the established transmission capacity entitlement cost in an approved project funding agreement. The main components of this project cost review would be:</p>	

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		<p>Quarterly project cost updates;            Project reevaluation if the project cost exceeds 10% of the approved cost; and            The option for California to suspend or cancel its funding agreement if the project exceeds 20% of its approved costs. This proposed project cost review recommendation is consistent with Southwest Power Pool’s existing project review process. SPP’s project cost review process has assisted with keeping project costs at or below their original cost estimates.<b>[20],[21]</b></p> <p>[1] Cal. Pub. Util. Code, § 309.5.            [2] ON-Line is owned by NV Energy and runs south between the Robinson Summitt substation and the Harry Allend Substation. The Harry Allen substation in Nevada connects to the CAISO owned Desert Link line which terminates at the California- Nevada border at the Eldorado substation.            [3] Southwest Intertie Project (SWIP) North, Overview of March 2016 ITP Submissions to CAISO, NTTG &amp; WestConnect, LS Power (Presentation), slide 5.            [4] Southwest Intertie Project (SWIP) North, Overview of March 2016 ITP Submissions to CAISO, NTTG &amp; WestConnect, LS Power (Presentation), slide 11.            [5] Southwest Intertie Project (SWIP) North, Overview of March 2016 ITP Submissions to CAISO, NTTG &amp; WestConnect, LS Power (Presentation), slide 11.            [6] Southwest Intertie Project (SWIP) North, Overview of March 2016 ITP Submissions to CAISO, NTTG &amp; WestConnect, LS Power (Presentation), slide 11.            [7] 2018-2019 Interregional Transmission Coordination – Interregional Transmission Project Submittal, Great Basin Transmission ITP Submission to California ISO presentation (SWIP-North), May 2018, slide 6.            [8] CAISO 2022-2023 TPP: SWIP North Stakeholder Meeting, November 7, 2023 at p. 11.            [9] CAISO 2022-2023 TPP: SWIP North Stakeholder Meeting, November 7, 2023 at p. 11.</p>	

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>[10] CAISO 2022-2023 TPP: SWIP North Stakeholder Meeting, November 7, 2023 at p. 12.</p> <p>[11] Idaho Power Letter on the Southwest Interties Project North to the President and CEO of the California ISO, November 1, 2023 at p. 2.</p> <p>[12] CAISO 2022-2023 TPP: SWIP North Stakeholder Meeting, November 7, 2023 at p. 3. California has not approved the proposed 2024-2025 resource portfolio yet.</p> <p>[13] Federal Energy Regulatory Commission, Staff-Led Workshop on Establishing Interregional Transfer Capability Transmission Planning and Cost Allocation Requirements, December 6, 2022 at <a href="https://www.ferc.gov/news-events/events/staff-led-workshop-establishing-interregional-transfer-capability-transmission">https://www.ferc.gov/news-events/events/staff-led-workshop-establishing-interregional-transfer-capability-transmission</a></p> <p>[14] Second Meeting of the Joint Federal-State Task Force on Electric Transmission, February 16, 2022, Docket No. AD21-15, Transcript statements from FERC Commissioner Christie at pp. 43-44 and NARUC Chair Scripps at pp. 74 and 130.</p> <p>[15] U.S. Department of Energy National Transmission Needs Study, October 2023 at pp. 137-138.</p> <p>[16] CAISO Board Approved 2022-2023 Transmission Plan, May 18, 2023 at p. 102.</p> <p>[17] Recommendations from Gridwork's Western States Transmission Initiative, October 2023 a p. 5.</p> <p>[18] Idaho Power Generation Interconnection Queue, Open Access Same-Time Information System (OASIS) site as of November 14, 2023 at <a href="http://www.oatioasis.com/ipco/index.html">http://www.oatioasis.com/ipco/index.html</a>.</p> <p>[19] 2021-2022 Transmission Plan, CAISO, March 17, 2022 at p. 305.</p> <p>[20] SPP Open Access Tariff Business Practices at <a href="#">spp oatt business practices.pdf</a>. Refer to Section 5. Acceptance of an NTC-C or NTC 5.1.</p> <p>[21] Statement of Paul Suskie at the FERC Technical Conference on Transmission Planning and Cost Management. Docket No. AD22-8-000. Lines 14-18 on page 188 of the transcript.</p>	

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1J	Cat Creek Energy LLC	Cat Creek Energy LLC, with advanced Pumped Storage Hydro, Wind and Solar+ BESS projects in Idaho, supports CAISO's proposal to assume LS Power's entitlements on both SWIP-North and the existing One Nevada Line (ON Line), from Midpoint to Harry Allen, via a joint regional policy-driven project with Idaho Power Company.	The ISO acknowledges the support.
1K	City of San Jose and Ava Community Energy Authority	<p>The City of San José operates San José Clean Energy (San José), a Community Choice Aggregation (CCA) program serving the City of San José. Ava Community Energy Authority (Ava) is a CCA serving communities in Alameda and San Joaquin Counties.</p> <p>San José and Ava request that:</p> <ol style="list-style-type: none"> <li>1) the California Independent System Operator (CAISO) provide ongoing, timely, transparent information about the status of SWIP North project to stakeholders including Load Serving Entities (LSEs), and, if the project is approved, promote coordination so that the generation, import capability and contracting needed to garner the benefits of SWIP North can progress; and</li> <li>2) the CAISO maximize opportunities for LSEs importing Idaho wind over SWIP North to obtain related resource adequacy.</li> </ol>	<p>The ISO commits to provide ongoing, timely, transparent information about the status of SWIP North project to stakeholders including Load Serving Entities (LSEs) as appropriate.</p> <p>The ISO, subject to CPUC reaffirmation, will plan to integrate Idaho wind resources as required by CPUC portfolio submissions. If the project is approved and proceeds, California LSEs would need to follow the existing MIC process of the ISO.</p>
1L	LS Power	<p>LS Power would like to thank CAISO staff for all of the hard work advancing the review of SWIP-North and its unique capacity entitlements to this present opportunity to help meet escalating policy-driven needs for diverse out-of-state (OOS) renewable resources at the lowest cost. The expression of interest process performed as part of the 2021-2022 Transmission Planning Process (TPP) affirmed a very strong interest on the part of LSEs to access Idaho wind and other OOS renewable resources. A current survey of the regional generator interconnection queues identifies over 50 GW of OOS renewable resources and storage (including more than 10 GW of wind) that have potential to deliver southbound into CAISO via the entitlements sought by CAISO from SWIP-North/ON Line. SWIP-North offers a wide array of additional economic and reliability benefits that will be realized by CAISO ratepayers if SWIP-North is constructed and CAISO secures bi-directional</p>	The ISO acknowledges LS Power's comments.

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>capacity entitlements from Midpoint to Harry Allen. The 2021-22 TPP showed positive economic benefits associated with SWIP-North, and additional congestion relief benefits were identified in the 2022-23 TPP. SWIP-North relieves economic congestion by offering an alternative path from the Northwest, while also providing a pathway to export excess solar thereby reducing renewable curtailments in California and capturing WEIM benefits. This parallel transmission path also offers reliability and resiliency benefits during wildfire or extreme heat-related events, and it provides load diversity benefits to avoid future load-shed events and increase RA in CAISO. It also reduces more GHG emissions on a \$/MWh basis compared to California solar because OOS wind generates more during the higher priced evening hours. The Brattle Group has previously identified these and other benefits provided by SWIP-North[1]. Consideration of SWIP-North and its associated capacity entitlements in the 2022-23 TPP is consistent with CPUC's request in accordance with SB 887 (Becker, 2022) that CAISO identify high priority transmission projects and consider whether to approve them as part of the 2022-23 TPP, as well as CPUC's charge to CAISO to "get a head start on identifying any associated transmission needs by considering the results of the similar sensitivity case that is currently undergoing analysis in the 2022-2023 TPP cycle".[2] SWIP North is uniquely situated as an advanced development project with significant cost advantages given that it comes with transmission rights over the ON Line segment connecting Robinson Summit Substation to Harry Allen Substation, which is nearly half of the length of the entire SWIP path. ON Line is already in service and is paid for by Nevada ratepayers. Given the demonstrated policy need and the significant economic and reliability benefits that come with such a unique opportunity, now is the ideal time to approve the project.</p> <p>Failure to move forward to secure SWIP North/ON Line entitlements in the 2022-23 TPP will increase cost and schedule risks at the expense of ratepayers. Costs continue to escalate for both equipment and labor. Delayed equipment orders and</p>	

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		<p>construction contracts bring the risk of new cost increases from inflation, supply chain challenges, and market demand dynamics. Adding to the cost concerns are availability of major equipment. For example, major substation equipment such as reactors and phase shifting transformers have unprecedented lead times of three years or more, and manufacturers have indicated those lead times are only going to increase with the amount of high voltage transmission projects being planned worldwide for installation between 2027-2032. SWIP North is uniquely situated to begin securing equipment for a 2027 in service date if CAISO approves the project in the 2022-23 TPP. Similarly, there is a risk of labor shortages if the project is delayed any further as local qualified linemen and other classes of labor will be needed to construct the dozens of projects already approved in the 2022-23 TPP plus those to be added in the 2023-24 TPP and subsequent TPPs. Furthermore, the current collective bargaining agreement includes established rates through May 2027, after which they will be renegotiated. SWIP North reflects a unique opportunity as an advanced development project that can take advantage of available equipment and labor ahead of the onslaught of resources required to support the significant transmission needs planned for CAISO and throughout the West.</p> <p>[1] "SWIP-North Benefits Analysis." February 2021. Michael Hagerty, Johannes Pfeifenberger, and Evan Bennett. The Brattle Group. <a href="https://www.brattle.com/wp-content/uploads/2021/06/21438_swip-north_benefits_analysis.pdf">https://www.brattle.com/wp-content/uploads/2021/06/21438_swip-north_benefits_analysis.pdf</a></p> <p>[2] CPUC R.20-05-003, February 23, 2023, Decision Ordering Supplemental Mid-Term Reliability Procurement (2026-2027) and Transmitting Electric Resource Portfolios to California Independent System Operator for 2023-2024 Transmission Planning Process, page 50  at: <a href="https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K956/502956567.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K956/502956567.PDF</a></p>	



No	Submitting Organization	Comment Submitted	CAISO Response
1M	Pacific Gas & Electric	<p>PG&amp;E's comments, as detailed further below, focus on the following key issues:</p> <p>PG&amp;E is concerned that CAISO's proposal circumvents Phase 3 of CAISO's transmission planning process and is counter to current FERC policy and CAISO's competitive transmission protocols for selecting the "least-cost, best-fit" transmission solutions. PG&amp;E is also concerned about the precedent of CAISO acquiring Great Basin Transmission's (GBT's) entitlements on the SWIP North transmission line in the proposed manner without a competitive solicitation process would set for future identified additional transfer capacity needs, and the ability of other entities to undermine CAISO's transmission planning process.</p> <p>Notwithstanding PG&amp;E's concerns about the process undertaken here by CAISO and GBT, if CAISO staff decides to proceed with recommending approval to the CAISO board, PG&amp;E recommends the following additional conditions be placed on approval of acquiring GBT's entitlements on the SWIP North transmission line.</p> <p>CAISO's approval for acquiring GBT's entitlements on the SWIP North transmission line be contingent on Bureau of Land Management (BLM) approval for the lease on federal lands, and any other state or local permits for at least one of the three known wind energy projects under consideration near Midpoint Substation in Idaho.</p> <p>The CAISO adopt strong cost containment measures, <b>including a binding cost cap for the project</b> and make those measures public to all stakeholders, especially since the estimated cost of the project has risen nearly 72% since November 2021.</p> <p>GBT, CAISO and Idaho Power be required to jointly pursue all available Department of Energy (DOE) grant and loan programs designated for electric transmission to help offset capital costs of the transmission line that would be passed onto CAISO customers.</p>	<p>Competitive solicitation process is not required for the current proposal under consideration as it is seeking assumption of entitlements on not only a proposed transmission line but also on an existing transmission line as opposed to approving and developing an entirely new 500+ mile transmission line between Idaho and California. Moreover, Idaho Power, a joint capacity off-taker in the current proposal, does not have competitive solicitation requirements for transmission.</p> <p>The ISO is planning based on submitted portfolios by the CPUC. The out-of-state resources modeled in the submitted CPUC portfolio are generic resources and do not specifically point to a particular resource such as Lava Ridge. The ISO does not conduct its transmission planning to integrate specific resources in its TPP as this would be inconsistent and in violation of its FERC-approved tariff and open-access requirements. Furthermore, the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 IRP in providing the portfolios for use in the ISO's 2024-2025 TPP as a condition for Board approval.</p> <p>The ISO notes that although the CPUC IRP process did not run scenarios with the updated cost assumption for SWIP North, the results discussed on <a href="#">slide 61 of CPUC presentation under the 2023 IRP process</a> imply the general attractiveness of out-of-state wind to meet the state's GHG and reliability goals.</p> <p>However, the ISO notes that based on stakeholder concerns related to SWIP North current cost estimates, it has added an additional condition for Board approval – the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 TPP portfolio decision. If reaffirmed,</p>

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		<p><i>Detailed Comments</i>            PG&amp;E appreciates the opportunity to provide comments on CAISO's proposed recommendation to acquire entitlements on Great Basin Transmission's (GBT's) SWIP North and the One Nevada (ON) transmission lines. PG&amp;E believes that out-of-state wind and resource diversity will be important for California to meet its clean energy goals, and we generally support CAISO taking steps to enable access to out-of-state wind for LSEs procurement needs.</p>	<p>this will ensure that Idaho wind continues to remain economical relative to other competing resources.</p> <p>Though the ISO has not specified a cost cap on the overall project, the ISO will work with GBT to require prudent cost containment measures in a definitive project sponsor agreement.</p> <p>In order to prudently manage any potential cost escalations, the ISO plans to negotiate provisions including a "meet and confer" clause to the definitive agreement should the project costs exceed 10% of the provided project cost estimate. It is expected that GBT will develop a comprehensive risk register and mitigation plans that will be used for the Project based on experience permitting, designing, procuring and constructing similar projects in the West and throughout the U.S., including DesertLink and the ON Line.</p> <p>GBT will be required to apply to become a Participating Transmission Owner (PTO), at which point the ISO Board may evaluate the specific cost-containment measures agreed to by the parties, which would be reflected in a project sponsor agreement filed with FERC. Additionally, one of the conditions for the approval of the ISO's recommendation is FERC acceptance of GBT's transmission revenue requirement rate structure and TO tariff.</p> <p>Please see above for the ISO's responses to your comments.</p>

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>PG&amp;E, however, is concerned that CAISO's proposal, circumventing Phase 3 of CAISO's transmission planning process, is counter to current FERC policy[1] and CAISO's competitive transmission protocols.[2] The process under which CAISO proposes to acquire GBT's entitlements and pass the costs of the entitlements to the High-Voltage Transmission Access Charge (TAC) would bypass the normal course of CAISO's competitive solicitation process for new regional transmission projects 200 kV or greater – which seeks to select the project sponsor that is best able to construct, maintain, and operate the particular transmission facility in a cost-effective, efficient, prudent, reliable, and capable manner while maximizing overall benefits – and would not evaluate other qualified project sponsor proposals to see if there are more appealing proposals to maximize customer benefits to meet a regional transmission need identified in the transmission planning process.</p> <p>PG&amp;E is also concerned about the precedent of acquiring GBT's entitlements on the SWIP North transmission line in this manner would set for future identified additional transfer capacity needs, and the ability of other entities on a going forward basis to now undermine CAISO's transmission planning process for in state and out-of-state projects that may be necessary in the future. As an example of the risk of undermining the integrity of the transmission planning process, what would preclude other merchant transmission developers in identifying future potential California resource needs, advocating for those resources to be selected in the Integrated Resource Planning process at the California Public Utilities Commission (CPUC), obtaining all permits and land rights for accessing those selected in-state or out-of-state resources (or to serve load), and then advocating that that project developer is situated as the best candidate to construct and own that project since it is shovel ready and can be online earlier than going through the normal competitive solicitation process? This in effect defeats the current policy for competition, which is to evaluate proposals and select the one that maximizes overall benefits to customers.</p>	

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>Notwithstanding PG&amp;E’s concerns about the process undertaken here by CAISO and GBT (affiliate of LS Power), if the CAISO staff decides to proceed with recommending approval to the CAISO Board, PG&amp;E recommends the following additional conditions be placed on approval of acquiring GBT’s Entitlements on the SWIP North transmission line:</p> <p>Unlike the under-construction New Mexico and Wyoming wind projects[3] [4] that would be delivered to CAISO load centers via to the SunZia and TransWest Express transmission lines, PG&amp;E understands the proposed out-of-state wind projects that would be developed near Midpoint Substation in Idaho are still awaiting Bureau of Land Management (BLM) approval[5] for leases on federally administered land and that BLM is expected to make a decision in early 2024 on at least the Lava Ridge Project.[6] Based on an examination of CAISO’s queue and other publicly available information, there currently seem to be three projects proposed for development near Midpoint Substation – Lava Ridge, Salmon Falls and Taurus wind energy projects – none of which have begun construction yet due to awaiting BLM and possibly other approvals. Thus, PG&amp;E recommends that CAISO’s approval for acquiring GBT’s entitlements on the SWIP North transmission line be contingent on BLM approval for the lease on federal lands, and any other state or local permits that the three known projects may require. Otherwise, PG&amp;E is concerned that CAISO approval may lead to construction of a transmission line that provides no benefit for California end-use customers and primarily would benefit Idaho customers with exports from CAISO and the Southwest.</p> <p>Given this project is being recommended for approval without stakeholder vetting in the CAISO’s transmission planning process and GBT is being granted the right to sell its entitlements on SWIP North to CAISO for a regional project to access Idaho wind that otherwise bypasses the current competitive solicitation process, PG&amp;E recommends that CAISO adopt strong cost containment measures, <b>including a binding cost cap for the project</b>, and make those measures public to all</p>	

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>stakeholders. Strong cost containment measures are necessary since LS Power's estimated cost for the SWIP North transmission line has nearly doubled since 2019, when it was estimated at \$550 million to construct the SWIP North transmission line,[7] and LS Power's comments to CAISO following a November 18, 2021 TPP workshop indicated a capital cost of \$635 million (2020 USD).[8] In addition, the DesertLink (Harry Allen to Eldorado) transmission line operating since 2020 as Phase II of the greater SWIP project had a binding cost cap of \$145.5 million or \$2.42 million/mile,[9] which is 58% less than the proposed \$3.8 million/mile estimate for SWIP North. For ensuring customer rates are just and reasonable, it is vital for CAISO to ensure the current estimated cost of \$1.09 billion – an increase of 71% from its 2020 USD estimate - is reasonable by understanding why the estimated cost has increased significantly and what contingencies are embedded in the new estimate. Otherwise, if CAISO does not take the above steps, any purported benefits of approving the SWIP North line may not materialize for customers if the ultimate costs recovery sought by GBT for the SWIP North transmission line at FERC are higher.</p> <p>Lastly, PG&amp;E recommends that a condition of approval be that GBT, CAISO and Idaho Power be required to jointly pursue all available Department of Energy (DOE) grant and loan programs designated for electric transmission to help offset capital costs of the transmission line that would be passed onto CAISO customers. The DOE recently released its Final 2023 National Transmission Study (2023 NTS), with one of conclusions in the study being there is high congestion value of interregional transmission between California and the Mountains region (Utah, Wyoming, Idaho), and increased transmission between the regions would reduce system congestion and constraints.[10] In prior DOE workshops, DOE staff communicated that the 2023 National Transmission Study would help inform the Secretary of Energy's designation of new National Interest Electric Transmission Corridors (NIETCs), which would be eligible for specific DOE grant and loan</p>	

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>programs for NIETCs.[11] Given the 2023 NTS identified increased transmission between California and the Mountain region as having high value, PG&amp;E recommends that if the corridor is designated as a NIETC, the CAISO, GBT, Idaho Power jointly apply for NIETC-tied grants and/or loans for the SWIP North transmission line and pass any cost savings onto CAISO customers.</p> <p>[1] See FERC Order 1000, Paragraph Number 285.  [2] CAISO Tariff, Section 24.5.  [3] <a href="https://electrek.co/2023/05/04/us-largest-clean-energy-infrastructure-project-sunzia/">https://electrek.co/2023/05/04/us-largest-clean-energy-infrastructure-project-sunzia/</a>; <a href="https://ktar.com/story/5535086/sunzia-construction-begins-will-bring-3-5-gigawatts-of-clean-energy-to-arizona-by-2026/">https://ktar.com/story/5535086/sunzia-construction-begins-will-bring-3-5-gigawatts-of-clean-energy-to-arizona-by-2026/</a> (“The primary source of energy will be from SunZia Wind, a 900-turbine wind project near Corona, New Mexico, <i>that is already under construction.</i>”) (emphasis added)  [4] <a href="https://www.powercompanyofwyoming.com/news/alerts/2023/051023-construction-is-rolling-for-ccsm-project.html">https://www.powercompanyofwyoming.com/news/alerts/2023/051023-construction-is-rolling-for-ccsm-project.html</a> (“[H]eavy equipment operators and environmental compliance monitors began continuing construction of the Chokecherry and Sierra Madre Wind Energy Project on May 2, 2023”). PG&amp;E understands that an affiliate of TransWest Express’ parent company, The Anschutz Corporation, is developing these two wind energy projects to tie-into the TransWest Express transmission line for delivery to CAISO.  [5] <a href="https://eplanning.blm.gov/eplanning-ui/project/2013782/510">https://eplanning.blm.gov/eplanning-ui/project/2013782/510</a>  [6] <a href="https://www.eastoregonian.com/news/northwest/decision-on-big-lava-ridge-wind-project-expected-in-early-2024/article_494190f1-6aeb-5ab5-9409-b57cdd699539.html">https://www.eastoregonian.com/news/northwest/decision-on-big-lava-ridge-wind-project-expected-in-early-2024/article_494190f1-6aeb-5ab5-9409-b57cdd699539.html</a>  [7] <a href="https://www.northerngrid.net/private-media/documents/GBTSWIPN_Evaluation_FINAL.pdf">https://www.northerngrid.net/private-media/documents/GBTSWIPN_Evaluation_FINAL.pdf</a>  [8] <a href="https://stakeholdercenter.caiso.com/Comments/AllComments/97a24911-d1e6-4d36-8cfe-a29d9de4e50b">https://stakeholdercenter.caiso.com/Comments/AllComments/97a24911-d1e6-4d36-8cfe-a29d9de4e50b</a>  [9] LS Power SWIP-North Presentation, Slide 3. (November 2020) <a href="https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M353/K226/353226801.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M353/K226/353226801.PDF</a>.</p>	

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>[10] Department of Energy's 2023 National Transmission Study, p. 186. National Transmission Needs Study (energy.gov).</p> <p>[11] DOE Proposes National Interest Electric Transmission Corridor Designation Process   Department of Energy</p>	
1N	Southern California Edison	<p>SCE has several concerns with the Southwest Intertie Project – North (SWIP – North) as described by the CAISO.</p> <p>First, SCE is concerned with how quickly the CAISO plans to seek Board approval of the SWIP – North project. The proposed date for the CAISO Board vote on December 12-14, 2023, provides effectively no time for additional stakeholder discussion. Although SWIP– North has been identified in prior CAISO Transmission Planning Process (TPP) cycles, this proposed project has not undergone full stakeholder vetting through the TPP. In general, SCE is concerned with the CAISO selecting transmission that bypasses the TPP process and the evaluation of alternatives, even when seeking to satisfy the CPUC's resource portfolio requirements.</p> <p>Second, given the lack of a full stakeholder vetting through the TPP, it is critical that actual cost figures of the CAISO's proposal be shared with all stakeholders before deciding to move forward with the project. Without a better understanding of the costs of the project, SCE cannot evaluate the cost/benefit. In addition, once a more thorough cost estimate is provided, what cost containment provisions will the CAISO require as a condition of final approval? SCE notes the CAISO previously estimated SWIP– North to cost \$635 million (in 2020 dollars, based on the 2020 ITP submission).[1] As such, the current cost estimate of \$1.09 billion for SWIP– North has escalated approximately 72%</p>	<p>The ISO has provided regular updates through stakeholder engagement sessions and as part of its TPP regarding integrating Idaho wind resources and the SWIP North transmission project. Apart from an economic assessment of the SWIP North project, the 2021-2022 TPP clearly notes the need to progress on integrating Idaho wind resources which eventually led to a stakeholder session on June 27, 2022, and an REOI on August 25, 2022. A further stakeholder session was conducted on November 17, 2022. Furthermore, the most recent Board approved 2022-2023 TPP clearly noted the ISO's engagement with Idaho Power given its interest in the project and the potential for collaboration on the project. The ISO is seeking Board approval to assume entitlements on both the existing ON Line and the planned SWIP-North line, as an extension of the ISO's TPP process. The agreement with GBT will also require FERC approval.</p> <p>Please see ISO responses to BAMX under 1A and PGE under 1M on this subject.</p>

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>within 2 – 2 ½ years. SCE seeks additional information about why the project’s cost estimate has almost doubled.</p> <p>Third, the CAISO must have a sound basis for arguing that California ratepayers will benefit from SWIP– North. SCE understands that no wind generation that would directly connect to the line is currently under development, and further, that such development would be subject to the rules and processes of Idaho Power. It is far from certain that any such wind generation will be built. For instance, SCE understands there has been significant community/stakeholder opposition to the Lava Ridge Wind Project located primarily on Bureau of Land Management (BLM)-administered public lands in Jerome, Lincoln, and Minidoka counties, Idaho. Moreover, if such wind generation is developed and connected in Idaho, it would not be within the CAISO’s BAA, but rather would be located in a different BAA (most likely Idaho Power). SCE asks the CAISO to provide detail on how potential new wind resources would be integrated with this project, and contrast this to how wind resources would be integrated if the CAISO was to build a new line directly from the CAISO to Idaho. SCE is also concerned that if no wind resources are developed, CAISO customers would still pay for roughly 77% of the line, but Idaho could be the main beneficiary (via exports of power from the CAISO to Idaho). SCE seeks to understand whether any other cost sharing arrangements (e.g., cost allocated in proportion to usage) were discussed that would better protect California in the event the line does not result in the development of new renewable resources per the CPUC intended scenario.</p> <p>Nonetheless, with proper cost control and cost allocation, SCE believes that the proposed SWIP – North project has a realistic potential to allow the CAISO to ensure sufficient transmission availability for California to meet its integrated resource planning portfolios, including both the 2023-2024 and 2024-2025 transmission plans which both provide for 1,000 MW of Idaho wind power in the TPP Base Case.</p>	<p>The ISO is planning based on submitted portfolios by the CPUC. The out-of-state resources modeled in the submitted CPUC portfolio are generic wind resources and do not specifically point to a particular facility such as Lava Ridge. The ISO does not plan to integrate specific resources in its TPP as this would be inconsistent and in violation of its FERC-approved tariff and open-access requirements. Furthermore, the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 TPP as a condition for Board approval.</p> <p>Please see the ISO’s response to PGE comments in 1M.</p>



No	Submitting Organization	Comment Submitted	CAISO Response
		[1] CAISO 2021-2022 TPP Stakeholder Meeting Presentation, Preliminary Economic Assessment Results, p. 15, November 18, 2021.	

**2. Please provide your organization's comments on the proposed cost sharing with Idaho Power.**

No	Submitting Organization	Comment Submitted	CAISO Response
2A	Bay Area Municipal Transmission Group (BAMx)	<p>The CAISO's proposal provides both the CAISO Load Serving Entities and Idaho Power the opportunity to meet their resource portfolio and diversity requirements while sharing project costs. BAMx applauds the CAISO's efforts in exploring opportunities to reduce the burden on the CAISO transmission ratepayers. The CAISO 2022-2023 Transmission plan also alluded to the possibilities for DOE funding for the unutilized capacity of the SWIP-North project that the CAISO was exploring, but it does not appear that such funding is expected to materialize, given the high project cost projections.[1] Even with Idaho Power's proposed participation, the resultant costs for CAISO ratepayers do not justify proceeding with this project at this time. In addition, the CAISO transmission ratepayers would be paying for 572.5MW (1,072.5MW minus 500MW of entitlements assumed by Idaho Power) of capacity in the South-North direction that likely will have very little value to CAISO ratepayers, and under the Extended Day-Ahead Market (EDAM) construct CAISO would share half of any Transfer Revenue value with Idaho Power even though Idaho Power would be paying nothing for that transmission capacity.</p> <p>BAMx supports conditioning approval of SWIP-North on Idaho Power filing and receiving approval for its SWIP-related case from the IPUC by June 2024, in addition to conditioning approval on continued CPUC endorsement of the project, as noted above.</p>	<p>Please refer to the ISO response to CPUC – Public Advocates Office in 1I.</p> <p>The ISO will continue to work with the CPUC as well as Idaho Power, the joint capacity off-taker in the proposal, to ensure value and benefits to ratepayers in both California and Idaho.</p>
2B	Large-scale Solar Association	<p>The CAISO's responsibility to pursue transmission infrastructure to support these resources is limited to Network Upgrades for the CAISO BAA.</p> <p>There are also Wyoming and New Mexico wind resources in the CPUC's Integrated Resource Plan portfolios, yet the major transmission projects to transmit those resources to the CAISO grid are being funded by the suppliers that will use them. Ratepayer funding will be limited to the Maximum Import Capability (MIC) process for New Mexico wind resources and the</p>	<p>In considering transmission needs necessary to achieve the state's energy policies, as reflected in the portfolios provided by the CPUC to the ISO for transmission planning purposes, the ISO considers options that are available. While merchant options are available and progressing to address some out-of-state needs – and the ISO is supporting those efforts through the development of the SPTO model – there are no such options currently available for meeting the need to access Idaho resources. The ISO's transmission planning process recovers costs for approved transmission solutions through the Transmission Access Charge</p>

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>equivalent Subscriber PTO mechanism developed for accessing Wyoming wind.</p> <p>In other words, contrary to the implication in the meeting presentation, the alternatives to this proposal are not necessarily limited to: (1) no line to Idaho being developed at all; or (2) a line where CAISO ratepayers must fund all the cost. Instead, funding the construction of the project through other alternative means should also be considered, for example:</p> <ul style="list-style-type: none"> <li>• The funding mechanisms used for the major lines planned for Wyoming and New Mexico wind resources. Resource developers will execute agreements with the transmission developers that will fund the cost of the lines to the CAISO. Specifically, these models should be considered and evaluated for this project: (1) the traditional transmission model being used for New Mexico imports, where a transmission developer is constructing the project based on sale of transmission service to generation developers; and (2) the Subscriber PTO model being used for Wyoming imports.</li> </ul> <p>Presumably, Load-Serving Entities (LSEs) will execute Power Purchase Agreements (PPAs) with these resource developers that will be used to pay for the costs associated with transmission service and fund the entire cost of the transmission projects. The CAISO should provide clear explanation regarding the potential feasibility of the SWIP North project to be constructed under these other models.</p> <ul style="list-style-type: none"> <li>• The Location-Constrained Resource Interconnection Facility (LCRIF) framework in the CAISO tariff. This option could allow the PTO (presumably Great Basin, in this case) to apply for temporary TAC support by demonstrating commercial interest for a large portion of the capacity. The CAISO should explore and explain</li> </ul>	

No	Submitting Organization	Comment Submitted	CAISO Response
		the potential feasibility of this approach as an alternative or additional project funding mechanism.	
<b>2C</b>	TransWest Express	TransWest has no comments on the proposed cost sharing with Idaho Power at this time.	
<b>2D</b>	Cal - CCA	The ISO's proposed cost-sharing with Idaho Power appears to ensure the costs funded by the ISO and Idaho Power amount to each entity's proportional share of the entitlements they each receive on the SWIP North and ON transmission lines. CalCCA supports this approach. Given the project would not be subject to competitive solicitation, however, the ISO should ensure cost containment measures are in place within the ISO's agreement with the PTO and make those measures transparent to the extent possible	Please note the ISO's previous responses to cost containment in response to comments from BAMX in 1A, and PGE in 1M.
<b>2E</b>	Fervo	The CAISO's cost sharing proposal with Idaho Power represents a classic win-win scenario and presents all parties with an opportunity to decarbonize their energy mix while meeting reliability requirements with the addition of cost-effective resources. Simply put, customers will reap significant economic and reliability benefits from the approval and construction of the SWIP North project as proposed by the CAISO.	The ISO acknowledges the comment.
<b>2F</b>	rPlus Hydro LLC	rPlus supports the proposed cost sharing with Idaho Power due to the operational and economic synergies afforded by broader participation.	The ISO acknowledges the comment.
<b>2G</b>	Six Cities	In addition to the comments provided in response to Question No. 1, given the project's expected costs and the uncertainties of Idaho wind development at this time, the Six Cities urge the CAISO to provide transparency regarding any contingencies applicable to its approval of the SWIP-North project. For example, if the arrangements relating to the Idaho Power entitlement are not approved by the Idaho Public Utilities Commission, the Six Cities support the CAISO retaining the right to review the need for and benefits of the project within the CAISO. Similarly, it appears that the CAISO has decided that it is appropriate for its transmission customers to assume the risk that Idaho wind projects capable of using the SWIP-North line to deliver capacity to the CAISO do not develop. How is the CAISO managing this risk?	Should Idaho Power not file a SWIP-related case with the Idaho Public Utilities Commission (IPUC) or should the IPUC not approve Idaho Power's SWIP-related case, the ISO would reassess at that point and bring forward a revised recommendation for ISO Board approval upon further review, due diligence, and appropriate stakeholder engagement.

No	Submitting Organization	Comment Submitted	CAISO Response
2H	California Public Utilities Commission	<p><b>How did CAISO determine the allocation of costs? Is the allocation based only on the capacity that CAISO will assume, or were there a set of benefits evaluated?</b></p> <p>CPUC Staff supports CAISO's efforts to collaborate with Idaho Power, Nevada Energy and Great Basin Transmission. CAISO proposes adding 77.2% of SWIP North costs to the CAISO TAC with Idaho Power funding 22.8% of the project. The PowerPoint from the November 7, 2023 stakeholder meeting seems to imply that the cost sharing is based on the MW entitlements that each will assume - 22.8% for Idaho Power assuming 500 MW of entitlements in the South to North direction, and 77.2% for CAISO assuming 1,117.5 MW in the North to South direction and the remaining 572.5 MW in the South to North direction.[1] While the allocation appears to be based solely on capacity, was there any consideration of a broader set of benefits to either Idaho Power or CAISO in determining the cost allocation?</p> <p>Consistent with Staff comments above, CAISO should consider updating the 2022-2023 Transmission Plan to include information about how costs were allocated between Idaho Power and CAISO. Providing stakeholders with transparent information about this cost sharing agreement would be instructive for all stakeholders and is important because cost allocation here is unique and this is the first agreement of this type for CAISO TAC ratepayers in more than a decade.</p> <p>[1] Slide 10.</p>	<p>The allocation of costs is based on the share of capacity that each entity assumes entitlements for.</p> <p>GBT entitlements North-South = 1,117.5 MW GBT entitlements South-North = 1,072.5 MW Total North-South and South-North = 2,190 MW</p> <p>ISO share = 1,117.5 MW North-South + 572.5 MW South-North = 1,690 MW (out of 2,190 MW) or <b>77.2%</b></p> <p>Idaho Power share = 500 MW South-North (out of 2,190 MW) or <b>22.8%</b></p>
2I	California Public Utilities Commission – Public Advocates Office	No additional comments at this time.	
2J	Cat Creek Energy LLC	Cat Creek Energy favors the proposed cost share with Idaho Power Company. Under the proposal, Idaho Power would assume a portion of the entitlements in the South to North direction, reducing overall project costs for California ratepayers. Costs are further reduced because of the unique cost and capacity sharing arrangement with NV Energy under	The ISO acknowledges the comment.

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>the existing Transmission Use and Capacity Exchange Agreement that governs ON Line and SWIP-North. Approving SWIP-North as part of the 2022-2023 TPP will enable delivery of renewable resources into California as early as 2027. Cat Creek Energy broke ground in September on the first module of its 1,761 MW Renewable Power Station in Idaho. The advanced project has transmission interconnection through Idaho Power Company and the CAISO proposal regarding SWIP-N opens California markets to our project.</p>	
2K	City of San Jose and Ava Community Energy Authority	<p>San José and Ava support cost-sharing by Idaho Power to reduce the cost of SWIP North for California ratepayers.</p>	<p>The ISO acknowledges the support.</p>
2L	LS Power	<p>While LS Power fully supports Idaho Power participation and cost sharing, we request that the contemplated board approval not be conditioned on Idaho Power participation given that the entitlements are needed to meet CPUC resource portfolio requirements including the base portfolio in the 2023-24 TPP, and the fact that Idaho Power's anticipated state approval may come after adoption of the 2023-24 Plan. Such a condition creates uncertainty in the securing of long lead equipment and construction resources, as well as the ability of LSEs in California to implement their current procurement plans to contract for OOS resources. Removing the condition provides Idaho Power and its regulators confidence that the project is moving forward with or without their participation, encouraging them to act now to participate with direct cost sharing before the opportunity is missed.</p> <p>If CAISO nevertheless moves forward with a conditional approval, LS Power encourages CAISO to identify options to address the 2023-24 policy base case need with the SWIP North/ON Line entitlements if Idaho Power is unable to obtain such state approval by June 2024. As CAISO noted in the November 7 stakeholder meeting, the alternative project of building a new line from Midpoint to Harry Allen would be significantly more costly than the entitlements resulting from building SWIP-North given the capacity sharing with NV Energy across ON Line.</p>	<p>The ISO believes that the current proposal with Idaho Power, subject to various conditions being met and approvals received, reduces the cost impact to California rate-payers due to cost-sharing on the project.</p> <p>Should Idaho Power not file a SWIP-related case with the Idaho Public Utilities Commission (IPUC) or should the IPUC not approve Idaho Power's SWIP-related case, the ISO would reassess at that point and bring forward a revised recommendation for ISO Board approval upon further review, due diligence, and appropriate stakeholder engagement.</p>

No	Submitting Organization	Comment Submitted	CAISO Response
2M	Pacific Gas & Electric	PG&E has no comments at this time but reserves the right to provide further comments on any concerns in the future.	
2N	Southern California Edison	<p>The proposal for the CAISO to fund 77.2% of the SWIP – North project cost with Idaho Power funding the remaining 22.8% is reflective of the relative sharing of the 1,117.5 MW project N-S and the 1072.5 MW S-N (the 500 MW for Idaho Power being only one direction, S-N).</p> <p>While this may be reasonable, without assurance that wind generation will be built and connected, the cost allocation may not be a fair deal for California. SCE suggests discussing additional cost allocation, such as cost allocated in proportion to usage, or integrating aspects of both usage and rights into a cost allocation proposal.</p> <p>Of significant concern, the CAISO has apparently negotiated this framework independently, without engagement from the California ratepayers who will ultimately pay for the line. Such an approach to CAISO negotiations is unreasonable to California transmission ratepayers. Additional time should be used to include safeguards to the cost that California transmission ratepayers will ultimately be required to pay. Without additional safeguards (including better certainty on overall costs), it is impossible to conclude if this proposal is in the best interests of California transmission customers. Moreover, the CAISO should not negotiate on behalf of California transmission customers without providing an opportunity for customer input as part of that negotiation, and then present the results to California customers with a schedule that provides effectively no time to discuss or develop alternatives.</p>	<p>The ISO notes that based on stakeholder concerns related to SWIP North current cost estimates, it has added an additional condition for Board approval – the CPUC needs to reaffirm the need for Idaho wind in its 2024-2025 TPP portfolio decision. If reaffirmed, this will ensure that Idaho wind continues to remain economical relative to other competing resources and that the ISO needs to plan accordingly under its TPP.</p> <p>The ISO has been engaged with Idaho Power on the project as noted in its draft and final Board approved 2022-2023 TPP. Throughout the 2021-2022 and 2022-2023 TPP, the ISO has been engaging with stakeholders through its TPP on the issue of integrating Idaho wind resources and options it is pursuing to achieve this objective. Moreover the ISO’s TPP process pertaining to integrating Idaho wind resources is based on CPUC submitted actionable portfolios and the CPUC provides ample opportunity to all stakeholders as well throughout its IRP and TPP portfolio decision process.</p> <p>Additionally, please note the ISO’s response to comments from PGE in 1M.</p>

**3. Please provide any additional comments on the November 7th, 2023 Stakeholder Call discussion**

No	Submitting Organization	Comment Submitted	CAISO Response
3A	Bay Area Municipal Transmission Group (BAMx)	No additional comments at this time.	
3B	Large-scale Solar Association	<p>There are other major open issues with the proposal that should be addressed, including those listed below.</p> <ul style="list-style-type: none"> <li>• Lack of competition for building this project. The CAISO tariff requires competitive solicitation for stand-alone projects like SWIP North, and the subject projects have all received multiple bids from highly qualified entities (including LS Power itself). The CAISO or other project proponents have provided no explanation for why this project – which is proposed for TAC cost recovery like other similar stand-alone transmission projects – should be exempted from that successful competitive process.</li> <li>• Distortion of procurement decisions. The resources served by this TAC-funded project would have an economic advantage compared to Wyoming and New Mexico wind resources that must fund their own transmission to the CAISO system.</li> <li>• Potential stranded capacity: If the Idaho resources are less competitively priced than those from Wyoming or New Mexico and are not contracted by CAISO-area LSEs, the investment in this transmission line would be stranded and must be paid for by CAISO ratepayers regardless. Under the more traditional model, that risk is borne by transmission developers, not ratepayers.</li> <li>• Resource interconnection process. The CAISO tariff has considerable requirements for Variable Energy Resources, for example, and it is not clear whether the resources connected to SWIP North would have to comply with those requirements under the NVE tariff.</li> </ul>	<p>The ISO noted in its stakeholder presentation that it is not pursuing a competitive procurement for the proposal as it is seeking entitlements on a proposed transmission line (SWIP North) and an already existing line (ON line). Additionally, the joint off-taker of capacity in the proposal, Idaho Power, does not have a competitive procurement requirement for transmission.</p> <p>The ISO conducts its transmission planning based on resource portfolios submitted to it by the CPUC.</p> <p>Concerns around this and project costs are the reasons the ISO is seeking CPUC reaffirmation of Idaho wind in the 2024-2025 TPP decision as a condition of the Board approval for assuming entitlements on the proposed SWIP North transmission line and the existing ON Line.</p> <p>Idaho resources connecting to SWIP North are required to meet interconnection requirements to the transmission facilities these are connecting to including NV Energy’s interconnection requirements.</p>



No	Submitting Organization	Comment Submitted	CAISO Response
		<ul style="list-style-type: none"> <li>Resource Adequacy (RA) deliverability process. CAISO must provide adequate details regarding resource deliverability issues and any related implications of its proposed approach with enough clarity to assist stakeholder understanding. CAISO should explain if the wind resources that would be accessed through the project would be required to participate in the CAISO's Transmission Plan Deliverability (TPD) allocation process, or be treated as imports and require the utilization of MIC.</li> </ul>	Please see the ISO's responses to Cal CCA in 1D and Six Cities in 1G
<b>3C</b>	TransWest Express	TransWest has no additional comments.	
<b>3D</b>	Cal – CCA	CalCCA has no additional comments on the November 7, 2023, stakeholder call discussion.	
<b>3E</b>	Fervo	Fervo Energy Company ("Fervo") appreciates the opportunity to provide its comments on the California ISO's ("CAISO") intent, recommendations and timeline related to the northern segment of the Southwest Intertie Project ("SWIP North") as part of the 2022-2023 Transmission Planning Process. Fervo stands in support of the CAISO's conditional recommendation to assume Great Basin Transmission LLC's ("GBT") entitlements on the SWIP North transmission line as a joint regional policy-driven project, combined with the GBT entitlements on the 500 kV One Nevada Transmission Line ("ON Line").	The ISO acknowledges the support.
<b>3F</b>	rPlus Hydro LLLP	No additional comments at this time.	
<b>3G</b>	Six Cities	The Six Cities have no additional comments at this time.	
<b>3H</b>	California Public Utilities Commission	<p><b><i>What cost containment measures will be in the agreement with GBT? Has CAISO considered putting in place a cost cap?</i></b></p> <p>During the November 7, 2023, stakeholder meeting, a representative from PG&amp;E asked whether CAISO would consider a cost cap or other cost containment measures. CAISO staff stated that the agreements between CAISO and GBT will contain cost containment provisions, assuming the project goes forward.</p> <p>CPUC Staff supports the idea of a cost cap. As shown by the chart above, the scope and cost of the project have changed</p>	Please note the ISO's response to PGE comments in 1M.

No	Submitting Organization	Comment Submitted	CAISO Response
		<p>substantially in the six months since the 2022-2023 Transmission Plan was approved by the CAISO Board. The original \$870 million estimate has increased by \$220 million. CAISO TAC ratepayers will be responsible for the majority of these increased costs, and CAISO should consider measures like a cost cap to protect ratepayers.</p> <p>To ensure that cost containment measures in the agreement best protect CAISO TAC ratepayers, specific information should be provided about what these measures will look like. Will there be a cap? What enforcement mechanisms will CAISO have under the agreement if GBT exceeds the estimated costs? Would costs that go over the cap be disallowed from inclusion in the CAISO TAC?</p> <p>As the CAISO asserts that CAISO ratepayers will benefit from the SWIP North transaction, Staff requests further clarity on cost containment measures, financing, and plan for cost recovery in relation to the project.</p> <p><b><i>CPUC Staff supports CAISO pursuing DOE funding or grants for the Southwest Intertie Project North. Has CAISO considered requiring GBT’s pursuit of DOE funding, grants, or other alternative financing means to mitigate impact on the TAC?</i></b></p> <p>When CAISO management presented the 2022-2023 Transmission Plan to the CAISO Board, it stated CAISO had “approached the Department of Energy about potential funding around the SWIP North transmission project...”<sup>[1]</sup> At that same meeting, in response to a letter from the Northern California Power Agency that mentioned concerns about transmission costs,<sup>[2]</sup> CAISO management stated that, “our role is really to focus in on what’s the most efficient and cost effective alternatives to actually meet the identified transmission needs,</p>	<p>Please see the ISO’s responses to comments from the CPUC in 1H.</p>

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		<p>so I want to assure you that we take these costs very seriously..."[3]</p> <p>CPUC staff appreciates CAISO's interest in pursuing efficient and cost-effective transmission and how seriously CAISO takes its role in protecting CAISO TAC ratepayers. However, during the November 7, 2023 stakeholder meeting, a representative from the Public Advocates Office asked whether CAISO was pursuing DOE funding or grants. CAISO staff stated that Idaho Power may be pursuing DOE funding, but CAISO is not.</p> <p>CAISO no longer pursuing DOE funding is a departure from CAISO management's stated intention in the 2022-2023 Transmission Plan ("there may be opportunities for DOE funding for unutilized capacity that the ISO is currently exploring"[4]) and in CAISO Staff's May 2023 presentation of the Plan to its Board.</p> <p>CPUC Staff requests that CAISO consider requiring GBT to pursue DOE funding or grants[5] – and any other financing approaches that could mitigate impacts on the TAC and ratepayers – especially for any unused South to North capacity on the One Nevada or SWIP North lines.</p> <p>[1] <a href="#">CAISO Board meeting recording</a>, May 18, 2023, 1:03.</p> <p>[2] <a href="#">NCPA Letter</a>, May 16, 2023.</p> <p>[3] <a href="#">CAISO Board meeting recording</a>, May 18, 2023, 44:36.</p> <p>[4] p. 102.</p> <p>[5] On November 14, 2023, DOE announced a second round of funding as part of its <a href="#">Grid Resilience and Innovation Partnerships (GRIP) Program</a>.</p>	

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3I	California Public Utilities Commission – Public Advocates Office	No additional comments at this time.	
3J	Cat Creek Energy, LLC	No additional comments at this time.	
3K	City of San Jose and Ava Community Energy Authority	<p>San Jose Clean Energy’s 2022 Integrated Resource Planning (IRP) LSE Plan identified a need for 180 MWs of additional wind by 2035. Ava’s IRP LSE Plan identified a need for 987 MWs of additional wind by 2035, including both potential off-shore wind and on-shore wind resources. Both San José and Ava have undertaken several solicitations for new long-term renewables since they submitted their 2022 IRP LSE Plans. The responses in these solicitations suggest that in-state wind is both scarce and expensive. Thus, if LSEs are to diversify their portfolios with wind, they require access to out-of-state and, in the future, off-shore wind. Responses and discussions with out-of-state wind developers suggest that careful but creative contracting will be required for LSEs to access out-of-state wind in a manner that does not impose undue risk or costs on California rate payers.</p> <p>During the November 7, 2023, stakeholder call, the CAISO stated that SWIP North is a policy driven project justified to access Idaho Wind identified as needed through the California Public Utility Commission’s Integrated Resource Planning process. While transmission is needed to facilitate access to out-of-state wind, SWIP North alone will not benefit California consumers who will pay a significant portion of the SWIP North costs, unless their Load Serving Entities are able to effectively contract with Idaho wind developers, administer such contracts, and obtain the related resource adequacy.</p> <p>The fact that SWIP North is a policy driven project with the purpose of accessing Idaho wind makes coordination critical among the parties that will play a role in ensuring that transmission, import capability, generation and generation procurement are all progressing, and this includes LSEs. San José and Ava acknowledge that the CAISO must provide fair and nondiscriminatory service to all generation and</p>	<p>Thank you for providing details on your IRP and conclusions drawn from several solicitations for new long-term renewables. The CAISO will continue to provide ongoing, timely, and transparent information about the status of SWIP North development to stakeholders including Load Serving Entities (LSEs).</p>

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		<p>LSEs. However, this makes transparency all the more important and should not preclude coordination.</p> <p><b>The CAISO should provide ongoing, timely, and transparent information about the status of SWIP North development to stakeholders including Load Serving Entities (LSEs).</b></p> <p>San José and Ava ask the CAISO to provide ongoing, timely and transparent information about the status of SWIP North, as the project makes it way through CAISO review, approval and subsequent steps. Information on the status of SWIP North is important to LSEs considering Idaho wind, negotiating with Idaho wind providers, and potentially in the future, contracting for such wind.</p> <p>San José and Ava note that even with Governing Board consideration of SWIP in the upcoming months, key additional steps are needed for SWIP North to be built, and it will be important for LSEs to be able to track progress:</p> <ul style="list-style-type: none"> <li>• Great Basin Transmission LLC (GBT) will have to reach agreement with Idaho Power on construction and payment of the plan;</li> <li>• The GBT and Idaho Power agreement will have to be approved by the Federal Energy Regulatory Commission;</li> <li>• State regulatory approvals will have to be obtained for the project and its payment;</li> <li>• GBT will have to become a Participating Transmission Owner;</li> <li>• FERC will have to approve GBT's transmission owner tariff and revenue requirement.</li> </ul> <p>Further, if SWIP North is approved, the CAISO should also promote coordination among the entities needed to realize the benefits to SWIP North to California ratepayers, including CAISO staff supporting development of the project, and related FCDS or import capability, the transmission owner, transmission rights</p>	

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		<p>owners, generation developers and LSEs interested in being off-takers.</p> <p><b>The CAISO should maximize opportunities for LSEs contracting for out-of-state wind to obtain related resource adequacy.</b></p> <p>An important consideration for San José, Ava, and other California LSEs considering contracting with out-of-state wind is their ability to obtain the resource adequacy (RA) benefits of the resource and the degree of certainty associated with doing so. This is particularly important as LSEs subject to California Public Utilities Commission (CPUC) RA rules work towards compliance with the new slice-of-day RA regime. To meet slice-of-day requirements, California LSEs will require the type of RA associated with out-of-state wind that can provide capacity during overnight hours and to charge batteries. To the extent LSEs are unable to realize RA benefits related to their out-of-state wind long-term renewable resource commitments, LSEs will have to obtain RA from other sources in a highly constrained RA market, potentially unnecessarily increasing costs.</p> <p>The most certain structure for California LSEs to obtain RA with out-of-state wind would be one where the CAISO provides for FCDS related to such wind. While FCDS is typically associated with in-state resources, the CAISO has in the past made FCDS available to out-of-state resources. San José and Ava strongly encourages the CAISO to pursue this approach for out-of-state wind where feasible and affordable. The approach is particularly apt in the case of SWIP North since the project is a policy driven project justified in particular to allow California to access Idaho wind. Since this is the purpose of the project, it makes sense to ensure that out-of-state wind imported into California can also provide resource adequacy.</p> <p>If making FCDS available is not feasible, then San José and Ava urge the CAISO to include in its proposal to its Governing Board for approval of SWIP North a proposal to ensure there is</p>	<p>Please see the ISO's responses to Cal CCA in 1D and Six Cities in 1G.</p>

No	Submitting Organization	Comment Submitted	CAISO Response
		sufficient maximum import capability at the import locations available for Idaho wind. For example, if the import path for Idaho Wind on SWIP North will be Willow Beach, any approval of SWIP North should be accompanied by MIC expansion at Willow Beach. Since both transmission and adequate import capability are needed to maximize the benefits of out-of-state wind to California electricity users, pursuing both objectives should proceed in a coordinated manner.	
<b>3L</b>	LS Power	LS Power does not have any additional comments at this time.	
<b>3M</b>	PG&E	PG&E has no comments at this time but reserves the right to provide further comments on any concerns in the future.	
<b>3N</b>	Southern California Edison	<p>Based on the CAISO's November 7, 2023, presentation, SCE requests the CAISO to confirm the following:</p> <ol style="list-style-type: none"> <li>a. The CAISO will <u>not</u> be requesting its Board to approve the SWIP – North or ON Line as needed transmission additions or upgrades.</li> <li>b. The CAISO will be seeking Board approval of the following:               <ul style="list-style-type: none"> <li>o Authorize the CAISO to acquire (purchase) GBT's entitlements on SWIP –North and the existing ON Line and recover the costs associated with the CAISO's acquisition (estimated to be \$1.1 billion) through the CAISO Transmission Access Charge, subject to the following:                   <ul style="list-style-type: none"> <li>▪ Idaho Power filing and receiving approval for its SWIP-related case from the IPUC by June 2024;</li> <li>▪ Great Basin Transmission, LLC, a subsidiary of LS Power, applying to become a Participating Transmission Owner by July 1, 2024; and</li> </ul> </li> </ul> </li> </ol>	<p>The ISO's is seeking assumption of operational control of LS Power entitlements on the SWIP North transmission line and One Nevada transmission line (to which SWIP North connects), as a joint regional policy-driven project with Idaho Power, conditioned upon</p> <ul style="list-style-type: none"> <li>• Idaho Power filing and receiving approval for its SWIP-related case from the IPUC by September 30, 2024;</li> <li>• The CPUC reaffirming the need for Idaho wind in its 2024-2025 TPP portfolio decision;</li> <li>• Great Basin Transmission, LLC, a subsidiary of LS Power, declaring its intent to become a Participating Transmission Owner by July 1, 2024 and submitting its application in accordance with the CAISO Tariff and Transmission Control Agreement; and</li> <li>• The Federal Energy Regulatory Commission's acceptance of Great Basin Transmission's Transmission Owner Tariff and a transmission revenue requirement rate structure.</li> </ul> <p>Only the ISO's portion of the costs (77.2%) needs to be recovered through the CAISO Transmission Access Charge (TAC).</p>

No	Submitting Organization	Comment Submitted	CAISO Response
		<ul style="list-style-type: none"> <li>▪ FERC acceptance of Great Basin's Transmission Owner Tariff and a transmission revenue requirement rate structure.</li> </ul>	