

The ISO received comments on the topics discussed at the, June 27, 2022 stakeholder call from the following:

- Accessing Out-of-state wind resources

[California ISO - 2021-2022 Transmission planning process \(caiso.com\)](#)

Copies of the comments submitted are located on the 2021-2022 Transmission Planning Process page at:

[California ISO - All comments \(caiso.com\)](#)

The following are the ISO's responses to the comments.

1. Please provide your organizations comments on the proposed approach by the CAISO for accessing out-of-state wind resources

No		Comment Submitted	CAISO Response
1.	ACP - California	<p>ACP-California greatly appreciates the additional efforts that CAISO is making to evaluate and understand the interest in accessing out-of-state wind resources. ACP-California has requested additional assessments of interest in regional wind resources (and the transmission needed to deliver them) in the past. We appreciate CAISO's intent to gather information to better understand demand from California Load Serving Entities (LSEs) and to assess potential transmission projects to deliver diverse regional wind resources to meet California's needs. However, this process could have significant market and regulatory implications and ACP-California believes it is essential to proceed thoughtfully and in a manner that aligns with the adopted TPP. After the November Integrated Resource Plans (IRPs) are filed by California LSEs, there will be opportunity to integrate new LSE requests in the 2022-23 IRP cycle. It is critical to get this process and structure correct and to provide a predictable and transparent opportunity for participation. We applaud the CAISO for taking this important first step by establishing this procedure and fostering new regional transmission planning through an open and inclusive LSE-driven process.</p> <p>Below, we offer a number of comments and suggestions, including a request for additional time for CAISO and stakeholders to develop an appropriate process.</p> <p>ACP-California reiterates its support for CAISO accessing the interest in out-of-state wind resources. We also greatly appreciate that CAISO has, consistent with comments submitted by ACP-California on the Draft 2021-22 Transmission Plan, expanded this process to include not only Idaho wind, but also wind in other regions (such as Arizona, New Mexico, and Wyoming). However, we have concerns with the proposed construct, where CAISO will be running different processes with different sets of requirements for expressions of interest in Idaho and other areas, if CAISO proceeds with an LSE call that encompasses multiple regions before the November IRP filings</p>	<p>The ISO will engage stakeholders as it collaboratively develops a holistic approach to enable access to out-of-state wind resources.</p> <p>The ISO will not be running different processes with different sets of requirements for different regions. Based on stakeholder feedback received after the June 27th stakeholder event, the CPUC's 2021 preferred system plan (PSP), the economic study request for SWIP-North, and the ISO's 2021-2022 Transmission Plan, the ISO will be focusing its current efforts solely on understanding the level of interest, and commitment from LSEs in accessing wind resources in Idaho through a Request for Expressions of Interest (REOI).</p> <p>The Southwest Intertie Project ("SWIP")–North project is the subject of an economic study request. At this point, the SWIP–North transmission project is the sole known transmission project that would serve California LSEs in accessing out-of-state wind resources in Idaho. Hence, the REOI will focus on the attributes of the SWIP-North transmission project as the mechanism for accessing wind resources in Idaho. This REOI is not intended to pre-determine any outcome in the ISO's comprehensive transmission planning process or competitive solicitation process.</p> <p>Specific to the proposed SWIP-North transmission project, the ISO will not have any operational control of the proposed transmission line nor will the transmission line be part of the ISO's balancing authority area. The ISO will have access to the capacity being offered through entitlements. Access to Idaho resources by California LSEs through SWIP-North, will be based on the ISO's existing maximum import capability (MIC) construct, requirements, and allocation process. Additional details regarding the attributes of the SWIP-North transmission project can be found in the REOI.</p> <p>Additionally, the ISO will not be pursuing a refundable deposit requirement to indicate level of commitment. However, it is important that the ISO determines the level of interest, and commitment from LSEs in accessing wind resources in Idaho. Hence, the ISO will require some form of evidence if the LSEs were to express interest –</p>

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	<p>are due. Having separate processes may result in different outcomes than if these regions had been treated similarly. This could lead to a host of unintended consequences and inaccurate comparisons of the level of interest between the different wind resource areas.</p> <p>At present, it appears as though Idaho wind has a higher burden for LSEs to indicate an expression of interest (with a \$10,000/MW deposit refundable when a PPA with an Idaho wind resource is submitted to CAISO). This may allow LSEs to access regional wind via transmission that could be approved and paid for via the Transmission Access Charge (TAC), and yet it is not clear if this type of treatment might be available for LSEs that express interest in wind in other areas. While we understand the CAISO's reasoning for treating Idaho wind and the consideration of SWIP-North differently, the differentiation of wind resource/transmission project treatment warrants more extensive consideration and should not be based solely on past requests or chosen "business models" for developing transmission. Thus, we request CAISO consider developing – within this current effort – a more holistic and consistent process to assess interest in the various regional wind areas and associated transmission projects.</p> <p>Given that CAISO has indicated (in the Interconnection Process Enhancements Phase 2 Revised Straw Proposal) that this current process may provide the basis for further discussion on solicitation type models to support transmission development, it is particularly important that CAISO carefully consider the process for evaluating interest in out-of-state wind. We therefore ask for additional time and stakeholder engagement to explore ways to improve consistency in the expression of interest for various regions/transmission projects and to further evaluate the steps CAISO will conduct going forward. For instance, it would be helpful for CAISO to provide additional information on the structure of the solicitation of interest forms and what information will be collected from LSEs. We recommend CAISO host a stakeholder workshop to discuss</p>	<p>the evidence could be through letters of intent, exclusivity agreements, term sheets, PPAs or PPA proposals from out-of-state resources, attestation of interest, or information about discussions with out-of-state wind resources.</p> <p>Based on the outcomes of this REOI, if there is clear interest and a demonstrable commitment by LSEs to procure Idaho wind resources on a long-term basis, and there are proven benefits to California ratepayers, then the ISO will consider the results of this REOI as an input, in addition to other factors, in evaluating the potential to approve the need for the capacity in the form of the attributes of the SWIP-North project in order to support California's public policy goals, procurement directives, and reliability needs. In this event, because the SWIP North project was proposed as a regional project for cost recovery via ISO ratepayers, the ISO's competitive procurement principles and processes would apply.</p>

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		how these forms might be structured and what type of information CAISO should collect.	
2.	Arevia Power	Arevia Power is in favor of having CAISO explore all OOS transmission projects but we also understand the CAISO is hoping to gauge interests from LSEs as a mechanism to “test the market” which may not be the best approach. All of these transmission projects have taken years to develop and will bring in out-of-state wind resources, therefore every one of them deserves serious consideration. But the CAISO needs to ensure its analysis is based on the economic, resource, capacity, and transmission merits of each OOS transmission project in order to narrow in on its recommendations rather than an arbitrary LSE deposit mechanism focusing on one Proposal.	The comments are noted. Please refer to response provided in 1.1
3.	Arizona Electric Power Cooperative (AEPCO)	Arizona Electric Power Cooperative (AEPCO), on behalf of Anza Electric Cooperative (Anza) appreciates the opportunity to provide comments on CAISO’s approach to accessing out-of-state (OOS) wind resources. For background, Anza is a rural electric cooperative and CAISO load serving entity (LSE) located in Riverside County, California, serving over 5,000 meters across 700 square miles. Anza supports CAISO’s proposed approach for accessing OOS wind resources.	The comments are noted.
4.	Bay Area Municipal Transmission Group (BAMx)	<p>The Bay Area Municipal Transmission group (BAMx) appreciates the opportunity to comment on the white paper (“White Paper” hereafter) issued by the CAISO on “Accessing Out-of-State Wind Resources to meet California Resource Adequacy Requirements,” dated June 20, 2022, and the subsequent discussion on this topic on a stakeholder call on June 27, 2022.</p> <p>The CAISO has stated that the objective of the proposed outreach is to identify specific out-of-state transmission projects that should be developed to facilitate access to out-of-state wind resources. Historically, the CAISO has relied on the California Public Utilities Commission (CPUC) and other local regulatory authorities in assessing the procurement interest and commitment from the load-serving entities (LSEs) in the CAISO footprint. The current proposal that is limited to accessing out-</p>	<p>In the 2021-2022 planning cycle, the Commission provided a base portfolio and two sensitivity portfolios to the California ISO under its approved Power System Plan (PSP). The base portfolio and the Sensitivity 1 portfolio included out-of-state wind resources, particularly resources in the New Mexico, Wyoming, and Idaho areas. The CAISO studied these scenarios as required by the CPUC and published the results in the 2022 transmission plan.</p> <p>Furthermore, in the Decision 22-02-004 released on February 10, 2022, the CPUC notes [page 139]: “...to ensure that this amount of OOS resources can come online, additional action by the Commission, the CAISO, or both, may be required.” As such, the current initiative seeking interest from LSEs in accessing out-of-state resources is aligned with the objectives of the Commission and approved portfolios under the 2021 Preferred System Plan (PSP).</p>

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		<p>of-state (OOS) wind resources seems to be a departure from that practice. BAMx is concerned about what appears to be unequal treatment. Therefore, BAMx requests that the CAISO more fully explain the rationale for this apparent departure.</p>	
5.	California Community Choice Association	<p>California Community Choice Association (CalCCA) appreciates the opportunity to comment on the CAISO's proposed approach for gauging interest in accessing out-of-state wind resources. CalCCA understands the origination of this process as stemming from the 2021-2022 Transmission Planning Process (TPP) in which the California Public Utilities Commission (CPUC) Integrated Resource Planning (IRP) base portfolio included over 1,000 megawatts (MW) of out-of-state wind in <i>either</i> Wyoming/Idaho or New Mexico areas that are expected to require new transmission. In the 2021-2022 TPP, the CAISO performed an economic study on the base and sensitivity scenarios provided by the CPUC. While several transmission upgrade scenarios showed positive benefits to California Independent System Operator Corporation (CAISO) ratepayers, the CAISO indicated there was not sufficient economic justification to approve any upgrades in the 2021-2022 cycle. The CAISO also indicated that it had trouble directly comparing the cost-benefit ratios due to the differing cost/cost-recovery mechanisms proposed and differing output profiles from the various regions.</p> <p>CalCCA supports load-serving entities (LSEs) providing the CAISO with information about their commercial interest in accessing out-of-state wind in these regions to allow the CAISO to identify the resource adequacy (RA) potential of clean resources in different regions and compare the costs and benefits of transmission upgrades in these different regions. However, the CAISO should not require LSEs to put down a deposit along with their expressions of interest refundable upon signing a PPA. In summary, CalCCA recommends:</p> <ul style="list-style-type: none"> • The CAISO should not require LSEs to put down a deposit with their expressions of interest; 	Please refer to response provided in 1.1

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		<ul style="list-style-type: none"> • The expression of interest should request LSEs to provide the locations and MWs in which they see opportunities to contract with out-of-state wind resources for resource adequacy, along with supporting information as available; • If the CAISO does move forward with a deposit requirement, the CAISO should (1) include an additional condition for the refund in which, in the event the transmission project does not get built, and as a result, the LSE does not sign a power purchase agreement (PPA), the LSE would still receive a refund, and (2) clarify where the money will go if the CAISO does not refund it; and • The CAISO should clarify when and how it will use expressions of interest in coordination with the typical TPP processes to drive transmission projects. <p>Given this is a new process with potentially significant impacts on transmission build and RA procurement, it is critically important that the CAISO establish a process that will gain the most complete picture of commercial interest in out-of-state resources and that stakeholders understand how the CAISO will use the results of the expressions of interest to drive transmission build in the context of the existing transmission planning process.</p>	
6.	Cat Creek Energy LLC	Cat Creek Energy salutes the CAISO and the CPUC for their efforts to identify the most economically efficient, renewable out of state resources (OOS) to fulfill laudable climate goals while supplying vital resource adequacy to California electrical consumers. Additionally, Cat Creek Energy appreciates the CAISO for involving stakeholders in their proposed approach to accessing out of state wind resources.	The comments are noted.
7.	East Bay Community Energy	East Bay Community Energy (EBCE) appreciates the opportunity to provide comments on the June 20, 2022 “Accessing Out-of-State Wind Resources to meet California Resource Adequacy Requirements” white paper. EBCE generally supports cost-effective transmission development that	The comments are noted.

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		<p>will support (1) California’s emissions reduction goals, (2) delivery of additional resource adequacy, and (3) access to resources with diverse generation profiles.</p> <p>EBCE supports CAISO’s plan to utilize the TPP to develop out of state transmission that will support California reliability and the State’s emissions reduction objectives. Out of state wind resources are important assets whose generation profiles are complementary to the generation profiles of solar resources within California.</p>	
8.	EDF – Renewables	<p>EDF-R supports the CAISO’s focus on interregional transmission and exploring transmission opportunities to support out of state wind. EDF-R appreciates CAISO’s commitment to creating a roadmap to access out of state resources and hopes the Southwest Intertie Project North (SWIP-North) will serve as a proof of concept for future proposals, including proposals to enable wind located in various states including Wyoming, New Mexico, and Arizona. EDF-R believes interregional and merchant transmission can be valuable tools for addressing transmission development needs in the coming years – It is clear we need more transmission to support renewables and reliability.</p>	The comments are noted.
9.	Fervo Energy Company	<p>Fervo Energy appreciates the opportunity to provide stakeholder comments as the California Independent System Operator (CAISO) solicits industry feedback to gauge the level of interest in accessing out-of-state renewable resources in support transmission development required to economically satisfy in-state energy, policy, and reliability needs.</p> <p>Fervo Energy supports the CAISO in its efforts to ensure efficient and cost-effective solutions to meet the renewable energy needs of in-state, load serving entities (LSEs), while promoting safe and reliable operation of the bulk electric system with ever increasing levels of intermittent energy resources.</p> <p>Beyond gauging interest from LSEs in accessing out-of-state wind resources, Fervo Energy encourages the CAISO to</p>	The comments are noted – please refer to question 3 of Attachment A of the REOI.

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		<p>broaden the consideration of potential out-of-state resources to include geothermal energy. In issuing Decision 21-06-035, the Public Utilities Commission of the State of California directed load-serving entities subject to the Commission’s integrated resource planning authority to procure no less than 1,000 MW of resources with the following attributes:^[1]</p> <ul style="list-style-type: none"> • Resources must be able to deliver firm power (with a capacity factor of at least 80 percent) <ul style="list-style-type: none"> ○ The resource must not be subject to use limitations or be weather dependent • The resource must be a generating resource, not storage, able to generate when needed, for as long as needed • The resource may not have any on-site emissions, except if the resource otherwise qualifies under the RPS program eligibility requirements <p>Thus, the proposed approach by the CAISO in evaluating out-of-state transmission projects must consider resources beyond wind generation.</p> <p>^[1] See https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M389/K603/389603637.PDF</p>	
10.	Friends of Minidoka and partners	<p>The Friends of Minidoka is an official “friends” group of the National Park Service at the Minidoka National Historic Site, a unit of the National Park System, located in southern Idaho.</p> <p>Along with the National Park Service, the Friends of Minidoka and Japanese American community have significant concerns about the impact of LS Power’s proposed Lava Ridge Wind Project on the Minidoka National Historic Site, as a place for healing and learning.</p>	The comments are noted.

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		<p>Japanese American organizations and partners have sent the attached letter, dated July 8, 2022, to the Bureau of Land Management (BLM) asking it to pause the Lava Ridge National Environmental Policy Act (NEPA) compliance process and update the BLM's Monument Resource Management Plan, which is 37 years old.</p>	
11.	Geothermal Rising	<p>Geothermal Rising is concerned that the CAISO's question appears to limit potential out-of-state resources that can deliver over new transmission facilities to wind resources. In reality, geothermal resource potential in the region is fairly widespread. Figure 1 shows the location of identified moderate and high-temperature geothermal systems in the United States, identified by the USGS in its 2008 Geothermal Fact Sheet. Much of the geothermal potential is located in Nevada and Idaho, which are estimated to have a high probability of over 71 GW and 47 GW developable capacity respectively.. This shows that the CAISO should consider out-of-state geothermal as a significant resource in the area to potentially serve California load with firm baseload power.</p>	<p>The comments are noted – please refer to question 3 of Attachment A of the REOI.</p>
12.	LS Power Development, LLC	<p>LS Power appreciates the efforts of the California Independent System Operator (CAISO) in identifying the level of interest for out-of-state (OOS) resources to support transmission development required for in-state economic, policy, and reliability needs.</p> <p>LS Power appreciates CAISO engaging stakeholders for this new process to evaluate OOS transmission. LS Power supports utilization of the CAISO TPP process to develop OOS transmission that will support California reliability, resiliency, policy, and economics. The identification of near term supply shortages has given rise to the need for near term transmission and generation solutions, and if approved by CAISO, SWIP North will deliver new OOS resources into CAISO by 2025 to help mitigate these supply shortages.</p> <p>Given that 12,000 MW of OOS wind on new transmission is identified in the SB 100 Starting Point scenario and in CAISO's 20-Year Transmission Outlook, significant transmission will</p>	<p>Please refer to response provided in 1.1</p>

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		<p>need to be built, and this new process is an important first step for CAISO to prepare the grid in support of California's greenhouse gas reduction and renewable energy objectives.</p> <p>In order to meet this significant need for transmission, we suggest that CAISO cast a broad net soliciting input from both generators and LSEs and uses a qualitative approach to assess interest in OOS renewables versus a bright line test or financial commitment to support approval of transmission. The contemplated Expression of Interest process needs to be carefully designed to consider the inherent challenges of procurement of OOS resources when there is not certainty of OOS transmission access so that an opportunity to provide access to diverse renewables and mitigate near term capacity shortfalls is not missed.</p>	
13.	LSA	<p>Overall, LSA is puzzled by the different approaches taken by the CAISO to assess interest in Idaho wind resources compared to out-of-state (OOS) wind resources from other promising areas.</p> <p>We understand that an economic planning study was submitted into the 2021-2022 Transmission Planning Process (TPP) for the SWIP-North project specifically, but there should be a more systematic way to determine whether cost recovery through the CAISO Transmission Access Charge (TAC) is justifiable than "because they asked."</p> <p>At a minimum, TAC recovery should be reserved for OOS projects having additional ratepayer benefits from this project over those that would be provided by other projects (including those that might expand in-state transmission to provide more RA deliverability for in-state resources). TAC recovery may provide an advantage for projects receiving it over others, and there should be strong evidence that it would be justified.</p> <p>In fact, LSA is not sure that the CAISO has made a case for ratepayer funding of OOS-related transmission, when other imports must pay for their own transmission to the CAISO</p>	<p>Please refer to response provided in 1.1</p> <p>The comments are noted. The CAISO would like to point out that these are early stages of the initiative and it is focused on gathering information from stakeholders which will help inform its decision making process as this collaborative initiative evolves.</p>



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	<p>BAA. LSA understands that the CAISO needs to accommodate the resource portfolios selected by the CPUC and other regulatory authorities in the transmission planning process, but that doesn't necessarily mean ratepayers overall should pay the cost. The "expressions of interest" proposed by the CAISO could instead be provided, by LSEs or the applicable developers, via subscription to those projects and payment of transmission charges to the project sponsors.</p> <p>Effectively, OOS transmission to the CAISO is like a large trunkline gen-tie, or a Location-Constrained Renewable Interconnection Facility (LCRIF), which the CAISO has said is its model for this proposal. However, LCRIFs by definition do not meet the definition of Network Upgrades, and the financial support provided through the TAC is intended to be temporary, until the capacity is fully subscribed. Thereafter, the resources using the facilities (and their specific off-takers) would pay the cost, not ratepayers in general.</p> <p>The need for these prioritization judgments is apparent from the results of the CAISO's 20-Year Outlook, which indicates a need for many billions of dollars of new transmission. Clearly, prioritization and timing should be used to ensure that it is built in the right place at the right time, to mitigate impacts on ratepayers.</p> <p>Finally, LSA notes other benefits of the OOS projects under consideration that should be considered in a comparative assessment. Specifically, once in service, transmission lines can:</p> <ul style="list-style-type: none"> • <u>Provide access to resources other than wind energy.</u> Many areas that these OOS transmission projects would serve also have high solar potential that should also be considered in a CAISO assessment, and lines going through Nevada could provide additional access to geothermal energy also. Transmission facilities serving these areas will 	

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		<p>likely have higher utilization, and provide more flexibility, than those serving wind resources alone.</p> <ul style="list-style-type: none"> • Transmit electricity in two directions. Some of these projects could have the ability to relieve overgeneration conditions in the CAISO and prevent curtailment of renewable resources, but only if there is sufficient load in the other direction to provide such relief. Such transmission projects could more properly be considered Network Upgrades and not just one-way trunkline gen-ties. This aspect should also be considered as a potential benefit, where applicable, in any CAISO comparative transmission assessment. 	
14.	NV Energy	<p>NV Energy thanks the CAISO for allowing us to provide feedback and comments to the CAISO TPP approach for accessing out-of-state wind resources. NV Energy does not have specific comments on Proposal B and will provide feedback on Proposal A.</p>	The comments are noted.
15.	Ormat	<p>Ormat is a significant provider of geothermal resources to serve the West. Recent Ormat PPA counterparties include:</p> <ul style="list-style-type: none"> • Peninsula Clean Energy – 15 year beginning January 1, 2023, 26 MW, from repowered Heber 2 • CC Power – 20 year, beginning Q2 2024, up to 125 MW from new projects under development in Nevada and California • NV Energy – 25 year, beginning early 2023, 25 MW, North Valley Geothermal Project and 25 year, beginning Q4 2024, 135 MW, from new and existing projects in Northern Nevada. <p>Ormat sees substantial new geothermal potential in Northern Nevada as well as Idaho, resources that can deliver firm, baseload power to serve California load if sufficient transmission deliverability can be achieved. We appreciate the</p>	The comments are noted.

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		<p>opportunity to submit these comments to CAISO for consideration.</p> <p>The most important consideration is to not limit the assessment to out-of-state wind resources. The potential for geothermal near the proposed route of the various transmission lines is considerable. For instance, the Table below from the USGS Geothermal Assessment estimates substantial geothermal potential in Idaho and Nevada, much of which could become accessible to provide firm delivery to California load upon completion of the SWIP North transmission line. This geothermal generation would be able to deliver with a very high capacity factor (80-90%) versus Idaho wind (34% on average) and is not subject to weather-related curtailment due to “Winter Renewable Drought” events. Thus, each MW of geothermal generation delivering over SWIP North would provide 7,000 to 8,000 MWh of carbon-free energy each year versus 3,000 MWh or so from each MW of Idaho wind.</p>	
16.	PG&E	<p>PG&E appreciates the opportunity to provide its perspective on the CAISO’s proposed approach for accessing out-of-state (OOS) wind resources. Generally, PG&E supports California accessing out-state-wind as an option to meet its clean energy goals while ensuring system reliability and customer affordability, and PG&E itself is interested in investigating procurement of OOS wind to meet its own clean energy goals. However, PG&E believes that stakeholders (and particularly LSEs) need additional information on the status of OOS wind project development in the various states indicated in the whitepaper and also cost-effectiveness information on the various potential transmission lines that could bring OOS wind into California to assess which line would be most cost-effective for CAISO to commit to and put into its rate base.</p> <p>PG&E has been actively procuring resources to meet near-term needs (2023-2026) stemming from the CPUC’s Integrated Resource Planning proceeding. Recently, PG&E also requested authority to procure renewable resources for 2027 and beyond beginning early next year. Since PG&E has not</p>	Please refer to response provided in 1.1

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		<p>actively procured resources beyond 2026, it is challenging to know if wind projects that required OOS transmission have been developed or are under development in these areas, as well as the “all-in” costs of procuring OOS on new transmission. Thus, PG&E is not in a position to express a preference as to which transmission line to bring OOS wind into California should be chosen and whether or not it should be put into CAISO’s rate base. Therefore, PG&E recommends that the CAISO shift this standalone initiative from the 2021-22 Transmission Plan and place it into the 2022-23 Transmission Planning Process – which is expected to be approved in March 2023 - to provide additional time to do an analysis/comparison of which transmission line(s) coupled with wind projects being developed would be the most cost-effective for customers within the CAISO load footprint.</p> <p>As LS Power suggested in its March 15, 2022, letter regarding SWIP-North, the CAISO could test interest of OOS wind resources in accessing the transmission lines under consideration by reviewing the generator interconnection queues in regions to identify wind resources that have filed for interconnection in the vicinity of the transmission lines and/or issue a Request for Information (RFI) to collect information from wind projects that wish to express interest in accessing the CAISO market. As LS Power noted, the RFI could request generator nameplate capacity, development/permitting status, interconnection status, proposed commercial operation date, and proposed point of interconnection.</p> <p>A limited delay in a decision on a new transmission line to access OOS wind will likely have minimal negative impact on the timeliness of accessing out-of-state wind and will help ensure the most cost-effective and feasible project is chosen.</p>	
17.	Pattern Energy	<p>Pattern supports CAISO's intent to enhance resource diversity and seek more information on interest in regional wind. However, Pattern encourages CAISO to slow the process down for "Proposal B" resources, and consider a process in the future whereby wind resources across the region</p>	The comments are noted.

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		<p>are considered on a comparable basis, with more stakeholder review of the type of information to be included in expressions of interest. More general information should reflect the suite of development models to inform planning, development, and procurement. Given the potential implications of this effort, the process for collecting such information should be well-informed, thoughtful, and equitable.</p>	
18.	Pivot Power Management	<p>Pivot Power Management appreciates the opportunity to provide comments on the proposed SWIP North Line. The proposed line will bring quality, cost effective projects with reliable power to the markets the line serves. The renewable resources along the SWIP North line are abundant and the line will serve as a valuable connector of potential generation to load.</p>	<p>The comments are noted.</p>
19.	CPUC – Public Advocates Office	<p>The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) is an independent consumer 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>Cal Advocates supports the CAISO’s effort to gauge the interest of load-serving entities (LSEs) in accessing out-of-state wind resources. This effort will allow stakeholders to consider whether the transmission investments needed to access out-of-state resources will be ultimately beneficial to the state and ratepayers.</p> <p>As stated on the June 27, 2022 call, Cal Advocates is concerned that this process may fail to garner a robust response from LSEs. There are roughly 25 Community Choice Aggregators (CCAs), six investor-owned utilities (IOUs), about 47 publicly owned electric utilities, four rural electric cooperatives, and a significant number of direct access customers serving load in California, all of which could potentially contract for out-of-state resources. [2]</p> <p>This process to gauge interest in out-of-state resources will provide the most value to stakeholders and the CAISO if a</p>	<p>The comments are noted. CAISO will consider this input as it releases the request for expression of interest so as to ensure a robust response from LSEs.</p>

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	<p>significant number of LSEs participate. To that end, the CAISO should make every effort to pro-actively reach out to procurement staff at each California LSE to encourage their participation and to seek out their input in this process.</p> <p>This can be done by, at a minimum:</p> <ol style="list-style-type: none"> 1. Sending a notice to the service list of California Public Utilities Commission (CPUC) Rulemaking 20-05-003 (Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes). This notice should describe the CAISO's process for gauging interest in out-of-state resources along with clear instructions on how to participate. This Rulemaking is the forum through which CPUC-jurisdictional LSEs file their procurement plans, and as such, its service list is a relatively comprehensive representation of CPUC-jurisdictional LSE staff. 2. Emailing that same notice to California's municipal electric utilities and rural electric cooperatives, using the list available on the California Energy Commission's website (https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-load-serving-entities-lses). 3. The CAISO should report back to Transmission Planning Process stakeholders and provide a list of the LSEs it reached out to, which LSEs responded to the CAISO, and the LSE's response. Based on this report, CAISO and stakeholders can better understand the LSEs' interest in out-of-state resources. <p>Please send a response or any questions on these comments to steven.shoemaker@cpuc.ca.gov and david.peck@cpuc.ca.gov. Thank you.</p>	

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		<p>[1] California Public Utilities Code Section (§) 309.5.</p> <p>[2] A list of these load-serving entities is available from the California Energy Commission at https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-load-serving-entities-uses.</p>	
20.	San Jose Clean Energy	<p>San José Clean Energy (SJCE) supports utilization of the CAISO Transmission Planning Process (TPP) to develop out-of-state (OOS) transmission that will support California reliability, resiliency, policy, and economics.</p> <p>SJCE views OOS wind as critical to achieving California's and San Jose's aggressive greenhouse gas reduction efforts. New in-state wind opportunities are extremely limited. OOS wind has a good capacity factor and complements solar well as it is available overnight and in the evening. 12,000 MW of OOS wind is selected in the SB 100 Starting Point Scenario for CAISO's 20-Year Transmission Outlook. To access this amount of OOS wind, significant transmission needs to be built, and this new stakeholder engagement process is an important first step for CAISO to prepare the grid in support of California's greenhouse gas reduction and renewable energy objectives.</p> <p>In addition, CAISO should consider interest not only in OOS wind but also other resources that could potentially access CAISO if new transmission is built, for example geothermal resources in Nevada. This will help capture additional resource diversity and other potential benefits of the new transmission under the study.</p>	Please refer to response provided in 1.1
21.	SDGE	<p>SDG&E appreciates CAISO's outreach efforts and the opportunity to provide feedback on proposals A and B. It will be very important to consider the ability of any option to provide cost-effective and reliable energy that meets the state's clean energy goals to our ratepayers. An critical feature of reliable energy should include geographical/location diversity to ensure that resources are resilient through any single reliability event (cloud coverage, transmission outage, etc). This applies</p>	The comments are noted.



No	Comment Submitted	CAISO Response
	<p>not only when weighing proposals A and B, but also when weighing Out of State Wind in general against other more local options.</p> <p>However, we do acknowledge the potential for OOSW to be a least cost option if it is developed at scale. Planning, developing, and utilizing larger amounts of wind resources will lower the cost per MW of the transmission required to get the power to California. Other production cost benefits such as congestion relief must be subjected to specific modeling to reveal such benefits, however. Large scale may also mitigate some risks regarding the hourly useability of these wind resources, as they would presumably be spread out over many individual wind farms in different micro-climates found in varying geographic locations.</p> <p>Further underscoring the need for transmission geographical diversity and resiliency are mitigation needs protecting against extreme natural disasters (wildfire, earthquake, etc) that could potentially cause a large scale loss of resources. Any resources being considered (OOSW or otherwise) should take into account these diversity and resiliency benefits. This is a concern cited in FERC's Transmission System Planning Performance Requirements for Extreme Weather NOPR (RM22-10-000). FERC states:</p> <p>"Given the reliability risks associated with extreme heat and cold weather events, including the potential for widespread blackouts, we believe it would be appropriate for planning of the transmission system to account for extreme heat and cold weather events' potential impact over wide geographical areas, and to consider the changing resource mix and associated planning assumptions"</p> <p>It may be prudent to discuss the feasibility of these OOSW projects early. This will help iron out whether or not we can count on OOSW resources being available when they are needed. If long term grid planning processes advance too long</p>	

No		Comment Submitted	CAISO Response
		<p>before knowing whether these resources are cost-effective or feasible, any roadblocks may lead to a last-minute scramble to obtain resources that are less than ideal</p> <p>Finally, it should be noted that the grid will need to be planned to NERC TPL 001 standard. This includes requirements for a reliable grid after the loss of transmission, generation, or combinations of both. As pointed out above, geographical diversity of resources will help to reach this goal.</p>	
22.	Shell Energy	<p>Shell Energy appreciates the opportunity to comment on this matter. Specifically, it is appreciated this out-of-state wind portion of the TPP has been conducted as an addition to the normal TPP. We believe this approach lends this issue greater visibility in the stakeholder community.</p>	The comments are noted.
23.	Southwestern Power Group	<p>Southwestern Power Group (SWPG) appreciates the opportunity to comment on the CAISO's proposed approach for evaluating interest in accessing out-of-state (OOS) wind resources in response to LS Power's request to have its proposed SWIP North transmission project studied as an economic project in the 2021-2022 TPP cycle.</p> <p>As CAISO has acknowledged the various proposed OOS wind transmission projects have different cost recovery mechanisms which renders direct comparisons among them challenging. Furthermore, and as CAISO stated in its 2021-2022 Transmission Plan the SWIP North project is in a somewhat unique position due to its existing agreement with NV Energy regarding access to capacity on the Robinson Summit-Harry Allen One Nevada Line.</p> <p>For these reasons and since the SWIP North project is the only one of the OOS wind transmission projects that requested to be studied as an economic project in the 2021-2022 TPP cycle, SWPG recommends that the CAISO limit the impending open season process to Proposal A expression of interest in accessing Idaho wind through SWIP North. While there are merits to expanding the process to include commercial interest in accessing wind from Wyoming, New Mexico and/or Arizona</p>	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		<p>in addition to Idaho, the differing cost recovery mechanisms of the respective proposed transmission projects would add additional complexity to the solicitation process and likely render it infeasible to implement in CAISO's desired timeframe. Therefore SWPG believes that moving forward on Proposal A alone at this time is appropriate and responsive to LS Power's request for economic study.</p>	
24.	Stop Lava Ridge	<p>Hello - The comments are specific to Proposal A: Accessing Wind resources specifically located in Idaho through planned transmission projects such as SWIP-North project or future projects...See below in #2.</p>	The comments are noted.
25.	TransWest Express LLC	<p>TransWest Express LLC ("TransWest") supports CAISO's inter-regional transmission coordination efforts and appreciates this opportunity to provide comments on CAISO's white paper regarding accessing out-of-state wind resources.[1]</p> <p>Overall, TransWest is in favor of CAISO initiating an expression of interest ("EOI") process to gauge interest and level of competition from the load serving entities ("LSEs") in meeting part of their resource adequacy obligations using out-of-state wind resources in Idaho, Wyoming, New Mexico, and Arizona. However, TransWest has concerns about the disparate treatment of Idaho resources compared to other states' resources and the hasty timeline proposed in the White Paper.</p> <p>First, rather than running two EOI processes in parallel, and thereby separating Idaho resources from other out-of-state resources, there should be a single EOI proceeding that places all out-of-state wind resources on equal footing. TransWest is particularly concerned with the suggestion that CAISO may request that LSEs provide a refundable deposit to express interest in Idaho resources in Proposal A, while not requesting such a deposit for expressions of interest in other state's resources in Proposal B. Requiring a \$10,000/MW investment only in the Idaho EOI proceeding encourages LSEs to make a greater commitment to contracting with Idaho wind resources. This unfairly places a thumb on the scale in favor of</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>Idaho resources over the other states' resources. TransWest requests that the CAISO consolidate Proposals A and B and release a single expression of interest for out-of-state wind resources in Idaho, Wyoming, New Mexico, and Arizona. If the CAISO requests a refundable deposit from the LSEs, then the deposit should be equally requested for expressions of interest in resources from any of the four states.</p> <p>Second, the process timeline proposed in Section 7 of the White Paper, especially the time between the release of the EOI and the response deadline, is unrealistic. Out-of-state resources need a few more weeks to generate interest amongst the LSEs, especially if a monetary commitment is required from LSEs in their responses to the EOI. Moreover, the response deadline is too short for certain LSEs – such as Community Choice Aggregators – who would likely have to go through an internal review and board approval process before paying a refundable deposit to reserve out-of-state wind capacity.</p> <p>For these reasons, TransWest requests that the CAISO consolidate Proposals A and B into a single EOI, make the same process – including any refundable deposit – apply equally to out-of-state wind resources in all four states, and extend the process timeline to allow more time to generate interest amongst the LSEs and for LSEs to obtain necessary internal approvals for any requested refundable deposit.</p> <p>[1] CAISO, “Accessing Out-of-State Wind Resources to meet California Resource Adequacy Requirements in support of the CAISO’s efforts” (Jun. 20, 2022) (“White Paper”).</p>	

2. Please provide your organizations specific comments on Proposal A, including the level of commitment proposed

No		Comment Submitted	CAISO Response
1.	ACP - California	<p>While we do not have specific comments to offer on Proposal A or the level of commitment proposed, we reiterate our concern around the CAISO utilizing two different processes for assessing interest in wind in Idaho and everywhere else. At present, it could be interpreted that interest expressed under Proposal A might be used to support approval of a transmission line for which the costs may be included in the TAC, while expression of interest in other resources may require LSEs to pay individually for the transmission through generation contracts. This creates very different value propositions for these two similar resources. We therefore urge CAISO to regroup and determine a consistent approach for assessing interest in wind resource areas and transmission projects throughout the region. Alternatively, the CAISO might consider moving forward with expressions of interest for Idaho wind resources <i>only</i>, but hold off on seeking more general expressions of interest on out-of-state wind and transmission until the concepts and various models have been more thoroughly assessed and discussed among stakeholders.</p>	Please refer to response provided in 1.1
2.	Arevia Power	<p>Scope of Proposal: The CAISO, as noted in its 2021-2022 transmission plan, is interested in gauging interest from California LSEs in accessing out-of-state wind resources in Idaho through transmission projects such as SWIP-North or any future planned transmission projects.</p> <p>In addition to resource portfolio requirements, if there is keen interest and commitment on behalf of the LSEs along with proven benefits to California ratepayers, then the ISO would further explore the potential of adding a particular transmission project to the rate base and operating the transmission line as a participating transmission owner (PTO) in the CAISO footprint.</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>Arevia Power’s response to “Scope of Proposal”:</p> <p>Based on your presentation and our research, SWIP North will cost \$635M to build. As planned, CAISO will be granted 1000MW of transmission rights, which means any out-of-state wind resources on this line will be able to transmit power directly into CAISO without additional tolling/wheeling fees. This equates to cheaper/unencumbered wind energy directly transmitted in the CAISO system. Additionally, if SWIP-North were built, the existing SWIP-South path rating could be increased from 900 (N-S)/600 (S-N) MW to 2000/2000 MW, giving CAISO about a 1000 MW transmission right from Midpoint to Harry Allen. Arevia Power believes that to reach the goals of accessing the necessary Out Of State wind and increasing reliability in CPUC Base portfolio, SWIP-North is the logical and best value first step. The SWIP-North project increases existing SWIP-South line capacity dramatically and compliments the proposed GreenLink West and GreenLink North projects, expanding the potential for a broader Western regional transmission system. This increase in capacity may also create an opportunity with the Cross-Tie to deliver into CAISO in the future after SWIP North is built. SWIP-North opens up access to Idaho, and potentially Nevada, wind resources and projects increasing the potential for inter-regional collaboration. SWIP-North is the lowest cost, and of all the potential options available, it is the most advanced development, and it should be built first. While other good options exist and should be considered seriously, SWIP-North presents an opportunity to make an immediate “no regrets” investment to help CAISO achieve its stated policy goals and resource adequacy requirements in the most economically efficient manner.</p>	

No	Comment Submitted	CAISO Response
	<p>Level of Commitment:</p> <p>The California ISO plans to release a request for expression of interest as part of this engagement process following a stakeholder engagement kick-off workshop. The expression of interest request will help the ISO gauge interest from LSEs in contracting with out-of-state wind resources from Idaho. In this regard, it is important to understand the level of commitment from LSEs which will help in moving the procurement process forward.</p> <p><i>The ISO is exploring the possibility of LSE's providing the CAISO with a refundable deposit of \$10,000/MW which will be refunded after the LSEs finalize and submit to the CAISO, a Power Purchase Agreement (PPA) with Idaho resources for the MW capacity consistent with the amount they are intending to procure as part of their resource adequacy obligation requirements.</i></p> <p>Arevia response to "Level of Commitment":</p> <p>A deposit of \$10,000 / MW is significant (\$5,000,000 for a 500 MW wind project) and seems premature just to gauge interest from an LSE. Applying this requirement to Proposal A and not Proposal B could create a false impression of actual interest from LSEs.</p>	
3.	<p>Arizona Electric Power Cooperative (AEPCO)</p> <p>Anza has interest in contracting for clean, reliable, and affordable generation resources that satisfy clean energy policy goals and compliance with SB 100. As such, Anza supports CAISO's initiative to pursue access to OOS wind resources, including those located in Idaho, Wyoming, New Mexico, and Arizona. OOS wind resources have a generation profile that can complement CAISO's abundant solar fleet, adding much needed resource diversity to the system. Transmission projects such as SWIP-North, Transwest Express, and others, will enable access to these</p>	<p>Please refer to response provided in 1.1</p>

No		Comment Submitted	CAISO Response
		resources, providing an opportunity for LSEs such as Anza pursue long-term contracts. Should any transmission projects be added to the rate base (i.e. funded by CAISO load), Anza seeks assurance that all CAISO LSEs will receive import allocation rights (MIC) commensurate with the amount of incremental transmission capacity added, regardless of whether those LSEs contract for OOS wind resources individually.	
4.	Bay Area Municipal Transmission Group (BAMx)	<p>BAMx seeks clarity on the separation of Proposal A from Proposal B. After all, both proposals seem to deal with accessing wind resources through either proposed or new transmission projects in other neighboring states; the only difference is Proposal A deals with Idaho, whereas Proposal B refers to the other neighboring states, such as Wyoming, New Mexico, and Arizona.^[1] The only difference in accessing Idaho and other neighboring state wind resources seem to be the following. First, accessing wind resources in Idaho is dependent on the proposed Southwest Intertie Project - North (SWIP-North) transmission project, and SWIP-North is seeking regulated, cost-of-service cost recovery as a participating transmission owner asset from the CAISO. On the other hand, the proposed transmission projects that provide access to the Wyoming and New Mexico projects, that is, Transwest Express and Sunzia projects, respectively, are being developed on a subscriber basis, without the need for ISO transmission plan approval, to provide transmission service to resources seeking access to California markets. This in itself should not be a reason to have two separate proposals, especially since the transmission funding mechanism is not central to the first round of outreach to the LSEs, as the CAISO made clear during the June 27th stakeholder call. Therefore, BAMx recommends a single proposal that requests the level of commitments in contracting with OOS wind from LSEs from all neighboring states.</p>	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
5.	California Community Choice Association	<p>The CAISO proposes that LSEs put down a refundable deposit of \$10,000 MW with their expression of interest in Idaho wind that the CAISO would refund upon LSE submission of a finalized PPA with the Idaho resources for the MW of capacity consistent with what they intend to procure for resource adequacy. The CAISO should not require LSEs to put down a refundable deposit with their expression of interest for several reasons. <i>First</i>, there is uncertainty inherent within transmission planning around how this process will result in actual project approvals. This means that while an LSE may express interest in a project and put down a deposit, the transmission project may still not get built. In this case, it would not make sense for an LSE to execute a PPA for resources not deliverable to California. If the LSE would not receive its deposit back from the CAISO in this case, LSEs may be unlikely to place a deposit in the first place when such a deposit is at risk from both the developer moving forward with a PPA and the CAISO approving and building the transmission line. There are too many dependencies involved with getting new transmission built to make the expression of interest dependent upon signing a PPA – California approval, other states’ approvals, siting, and permitting issues can all play a role in the project progressing through to completion. <i>Second</i>, because LSEs did not submit the transmission project as an economic study request in the 2021-2022 TPP, it is unclear why the CAISO would require LSEs to put down deposits. Doing so places the burden of proof that the transmission will be used to serve CA load on the wrong entity. <i>Third</i>, it is unclear why the CAISO would require a deposit for proposal A but not proposal B. It appears to be because Idaho wind would be accessed through a project approved through the TPP as an economic study in the 2021-2022 TPP, while the wind in other areas would be accessed through projects using the subscriber model. However, under both proposals, the CAISO says, “...if there is keen interest</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>and commitment on behalf of the LSEs along with proven benefits to California ratepayers, then the ISO would further explore the potential of adding a particular transmission project to the rate base and operating the transmission line as a participating transmission owner (PTO) in the CAISO footprint.”^[1] This indicates the projects would be funded and operated in the same manner regardless of the original nature of the request. <i>Fourth</i>, it creates an imbalance in the requirements for expressions of interest in proposal A versus proposal B. The CAISO should align the manner in which LSEs express interest in proposal A and proposal B so that the CAISO can obtain a clear view of actual LSE commercial interest without imposing unnecessary barriers to expressing interest.</p> <p>Instead of a deposit, the CAISO should request that LSEs confidentially provide the following information with their expressions of interest to allow the CAISO to assess the level of commercial interest in each area:</p> <ul style="list-style-type: none"> • The locations and MWs in which LSEs see opportunities to contract with out-of-state wind resources for resource adequacy; • Potential transmission projects that CAISO should prioritize in its review that would allow California to access the resources the LSEs see opportunities with; and • Supporting information as available. Such information could include: <ul style="list-style-type: none"> ○ Letter of intent or attestation of interest; ○ Exclusivity agreement; ○ Term sheets; ○ PPA proposals from OOS resources; ○ Whether or not the availability of transmission will be a condition for signing a PPA; and 	

No		Comment Submitted	CAISO Response
		<ul style="list-style-type: none"> ○ Whether or not additional Maximum Import Capability (MIC) will be a condition for signing a PPA. <p>If the CAISO does move forward with a proposal to require a deposit with the expression of interest, the CAISO should clarify what happens to the deposit if an LSE does not sign a PPA following the expression of interest. It appears the CAISO will only refund a deposit if the LSE signs a PPA, but the proposal does not explain what happens to the deposit if the LSE does not sign a PPA. Since the CAISO is a non-profit public benefits corporation, the CAISO must use the revenues received or pay them out to market participants. Nowhere in the proposal does the CAISO highlight how this will happen. The CAISO should also include an additional condition for the refund in which, in the event the transmission project is not built, and as a result, the LSE does not sign a PPA, the CAISO would still refund the deposit to the LSE.</p> <p>[1] CAISO Whitepaper at 6 and 7.</p>	
6.	Cat Creek Energy LLC	<p>Cat Creek Energy is pleased that the CAISO has specifically sought renewable resources identification from Idaho through Proposal A. To reach California's ambitious renewable energy goals, California will need many additional transmission lines to carry load balancing renewables from other western states. Focusing on Idaho is appropriate given the ready-to-build SWIP-N terminates in the Gem State. Cat Creek Energy's innovative pumped storage hydro project is among the more than 12,000 megawatts of proposed renewable projects in Idaho. Idaho wind and solar renewable resources with complimentary-to-California weather patterns and output during long summer days, some of which can be delivered through the SWIP-N transmission line. Idaho resources and SWIP-N allows California LSEs to answer the legislative mandates and CPUC charge to deliver daily and multi day</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>resource adequacy and reliability to the electrical system.</p> <p>As a significant bonus, LSEs can unlock their currently curtailed California VRE over a CAISO approved, bidirectional line, enhancing the value of their transmission conscription with Cat Creek Energy. Our innovative hydropower-based energy storage facility is at the northern terminus of the SWIP-N line. The value proposition of Cat Creek Energy (CCE) allows mid-day California curtailments to be sent north to Idaho for daily balancing and for stockpiling in the facilities' vast energy storage reservoir for multi day use. CCE can move up to 870 MW north from California. CCE can store renewable energy at full power for 121 hours and up to 240 MW of continuous discharge over 15 days in much the same way a coal plant operator stockpiles its commodity to qualify its facility as a baseload generator. The sad fact is increased wind and solar will lead to production being stranded and curtailed daily, becoming a most inefficient resource, and hence, ultimately more expensive level of service. Building pathways where this resource is captured as opposed to wasted, creates an enhanced energy product, ready in seconds, just when the system needs it most and available to supply a host of ancillary and transmission services.</p> <p>Only Idaho resources and SWIP-N allow California LSEs access the unique value proposition of CCE to bank overproduction while bringing on complimentary weather and time of day resources to fill in the gaps of California's daily load forecast.</p> <p>CAISO should recognize the resiliency and reliability value Idaho renewables, including CCE, bring to the operation of the electrical grid and immediately include SWIP-N as a California transmission asset. CCE can be operational in 2027, just in time to capture and</p>	

No	Comment Submitted	CAISO Response
	<p>enhance a predicted explosion of VRE curtailments by directly connecting a multi-tasking renewable power generator to the California market.</p> <p>In its June 22, 2022 whitepaper on out of state wind resources, the CAISO floated the idea of a \$10,000/MW refundable Resource Adequacy procurement deposit for LSEs in order to signal interest in Idaho Resources for the purpose of transmission planning. Cat Creek Energy, LLC encourages the CAISO to reexamine its blanket market mechanism in light of the diverse charters of California LSEs. California Community Choice Aggregators (CCA), municipal and other electric cooperatives operating in a transparent fashion with publicly elected decision makers should be trusted to send signals without financial burdens. Investor-owned utilities make decisions, on the other hand, in private and therefore such market mechanisms as deposits are appropriate requirements.</p>	
7.	<p>East Bay Community Energy</p> <p>EBCE interprets the CAISO's proposal to levy a deposit on load serving entity (LSE) generation offtakers from the SWIP-North transmission line as an attempt to gauge the level and seriousness of interest in Idaho wind resources.</p> <p>EBCE supports CAISO's effort to determine LSE interest in SWIP-North interconnected resources. However, on principal, EBCE does not support the proposal that LSEs post deposits that will only be refundable upon execution of a power purchase agreement (PPA). Requiring a deposit that is non-refundable until or unless an LSE executes a long-term offtake agreement for a resource significantly weakens an LSE's commercial negotiation position. Imposing this deposit requirement shifts additional power to the developer during the course of negotiations. CAISO surely appreciates that negotiations for long-term offtake agreements may fail to result in executed agreements for a variety of</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>reasons, many of which are unrelated to transmission availability. EBCE is concerned by the CAISO's proposal to require a collateral posting on LSEs for resources dependent on future transmission assets, here based on LSEs' initial interest in projects that interconnect to the SWIP-North line, because this would negatively impact LSEs' ability to negotiate reasonable and fair commercial terms in their PPAs. The deposit requirement would penalize LSEs involved in earlier negotiations if those negotiations do not result in contracts but advantage LSEs that may execute contracts later. In other words, the CAISO's proposal would disincentivize early resource procurement and encourage LSEs to delay or avoid procuring out-of-state resources dependent on transmission development.</p> <p>EBCE believes there are better ways to ascertain the level and seriousness of interest in Idaho wind resources, such as CAISO requesting (1) signed exclusivity agreements between developers and LSEs, (2) executed term sheets, or (3) attestations signed by LSE senior leadership confirming that the LSEs are engaged in commercial negotiations.</p> <p>EBCE also seeks clarification from the CAISO to understand how the CAISO's FERC-approved Tariff permits collection of deposits on transmission assets from LSEs. CAISO costs borne by market participants typically follow the principle of cost-causation. The CAISO's proposal to require deposits by potential LSE offtakers of the SWIP-North line and the implication that LSEs that fail to execute PPAs will forfeit their deposits is inconsistent with cost-causation principles. At a minimum, if the CAISO moves forward with a deposit requirement for the SWIP-North line, then all LSE deposits must be refunded when the SWIP-North line is placed in service (and the CAISO has visibility</p>	

No		Comment Submitted	CAISO Response
		<p>into which LSEs are obtaining actual benefit from the transmission line).</p> <p>EBCE is also concerned that the proposed calculation for deposits of \$10,000 per MW of generation offtake appears to be an arbitrary value. If the deposit concept moves forward, EBCE proposes instead a \$3,000 per MW deposit as this value (i.e., \$3 per kW) is commonly used by LSEs when shortlisting projects for negotiation in LSE long-term resource solicitations.</p>	
8.	EDF – Renewables	<p>EDF-R supports the Southwest Intertie Project North (SWIP-North) proposal. EDF-R sees many benefits to this proposal and encourages the CAISO to consider the additional benefits of a North-South Transmission path that would have benefits beyond just importing wind such as increasing North-South transfer capability. Additionally, the SWIP project would be directly connected to the CAISO system via Harry Allen, other options may not be as well connected.</p>	The comments are noted.
9.	Fervo Energy Company	<p>Proposal A stands out in its ability to ensure reliability for the CAISO and the West, because northern Nevada and Idaho offer a diverse set of clean energy resource potential, including geothermal energy. The ability for geothermal generation to provide clean, firm baseload energy to California LSEs should not be understated as the state continues its transition away from natural gas-fired generation.</p> <p>Fervo Energy estimates that the region surrounding the SWIP-North proposal is capable of supporting over 1,000 MW of new geothermal resources. Furthermore, given the high capacity factor associated with geothermal generation, geothermal energy can be developed to the CAISO with a more efficient utilization of transmission system than aggregated wind resources of an equivalent nameplate rating.</p> <p>Finally, the SWIP-North provides a number of reliability benefits as an alternative path to the</p>	The comments are noted.

No		Comment Submitted	CAISO Response
		COI/PDCI and thereby increases inter-regional reliability. The bidirectional nature of SWIP-North ensures that imports from the PNW and Idaho can still be delivered, even in the face of natural disasters.	
10.	Friends of Minidoka and partners	Proposals for wind energy on Bureau of Land Management lands in southern Idaho have generated strong local and national opposition. See: www.stoplavaridge.com , the Stop Lava Ridge facebook group and recent press coverage.	The comments are noted.
11.	Geothermal Rising	The SWIP North transmission project provides an excellent opportunity to access geothermal potential in the northern Nevada and Idaho areas. If developed by 2025 as planned, it could support the delivery of more of the 1,000 MW of firm generation authorized by the CPUC's Midterm Reliability procurement decision (D.21-06-035). It is a key component for delivering firm geothermal energy to meet California's long-term needs as well. However, because SWIP North has not yet been approved, lack of deliverability for out-of-state geothermal has served as a barrier to negotiations between suppliers and LSEs, who require deliverable resources to meet their procurement obligations. Because of this, it is unlikely that LSEs are in a position to make the level of commitment proposed for the Expression of Interest (EOI), sending a false message of lack of interest in a highly valuable and viable resource. Geothermal Rising recommends that both generators and LSEs be polled regarding their potential interest and that the CAISO avoid a deposit-based EOI at this time.	Please refer to response provided in 1.1
12.	LS Power Development, LLC	<p><u>Solving the "Chicken and Egg" Problem</u></p> <p>LS Power suggests that the CAISO solicit and consider interest from not only California load serving entities (LSEs) but also proposed generation projects that could use SWIP North transmission capacity to deliver energy to California. Given the "chicken and egg" problem with generation and transmission, LSE interest in OOS resources and discussions among LSE's and OOS generators may not yet have matured</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>due to the lack of, and uncertainties around, transmission. Instead, LSE's may prefer to focus on resources where transmission solutions are known and certain. To illustrate the uncertainties, until CAISO approves SWIP North there is not a process by which generators can demonstrate progress to LSEs toward being interconnected to the CAISO controlled grid via SWIP North. However, many generators have begun developing projects in anticipation of transmission getting built out in the future, so that once the transmission is available they will be positioned to contract with LSEs. Specifically, there is over 13,700 MW of wind, geothermal, pumped storage hydro, and battery storage in interconnection queues that could potentially access CAISO if SWIP North is built. This, in and of itself, should be a strong indication to CAISO of the market interest in SWIP North capacity.</p> <p><u>Including Resource Diversity Benefits</u></p> <p>In addition, CAISO should consider interest not only in Idaho wind but also other resources that could potentially access CAISO if SWIP North is built. This will show a broader range of benefits through additional resource diversity. Additionally, some of these resources are in Nevada and Wyoming but can either connect directly with SWIP North or could otherwise reasonably access CAISO via SWIP North – so the inquiry should not be limited to resources in Idaho.</p> <p><u>Seeking Relevant Market Information</u></p> <p>CAISO could collect necessary information from potential generators that wish to express their interest in accessing the CAISO market via SWIP North. The request could include generator nameplate capacity, technology selection, development/permitting status, interconnection status, proposed commercial</p>	

No	Comment Submitted	CAISO Response
	<p>operation date, proposed point of interconnection, estimated capacity factor and representative production profile. If open to all resources, this approach could provide CAISO a complete picture of available resource diversity, volume, and reliability implications. With this information, CAISO would have confirmation that there is sufficient interest in utilization of the path to serve California load by resources of interest.</p> <p>In combination with other information gathered, CAISO could also use intelligence gained from the interest of generators and LSEs in using the capacity of the CAISO-approved Ten West Link Transmission Project (Delaney to Colorado River 500 kV Line) as support for the idea that once a new import path into California is approved, there will be significant interest in use of the capacity for the benefit of CAISO customers. Currently, there are more than 2,500 MW of new generator interconnection requests in CAISO's cluster studies that are enabled by the Ten West Link.</p> <p><u>Seeking LSE Expressions of Interest</u></p> <p>CAISO's consideration of LSE's providing a deposit of \$10,000 per MW until a power purchase agreement (PPA) is signed is not aligned with LSE needs for transmission access certainty prior to pursuing a PPA.. Furthermore, a deposit by LSEs is not required to support an approval for in-state policy, reliability, or economic transmission projects so this requirement would not align with current processes. Additionally, it is not clear what LSEs would receive in return for posting a deposit as compared to those who choose not to post a deposit. This lack of clarity potentially creates a free rider issue and is discriminatory to those who post a deposit. Finally, given the lack of certainty of a particular transmission project moving forward, LSEs may not have sufficient information to judge the</p>	

No		Comment Submitted	CAISO Response
		<p>likelihood of securing a PPA for OOS resources. In contrast, CAISO can help remove such barriers to entry and the “chicken and egg” problem for OOS renewable generators by approving OOS transmission that enables renewable development.</p> <p>As an alternative to LSE deposits, CAISO should request available evidence of LSE interest in contracting for OOS resources such as letters of intent, exclusivity agreements, attestation of interest or other status of discussions with OOS generators. In addition, CAISO should request LSE resource plan information.</p> <p>LS Power also suggests seeking the following information from LSEs to gauge the level of interest:</p> <ul style="list-style-type: none"> • Identification of PPA proposals from OOS generators, including in which state the generator is located and quantity/type of resource. • If availability of transmission has been an impediment or condition precedent to PPA deals. • If the transmission impediment or condition precedent was resolved, would the LSE have interest in moving forward with contracting for the OOS resources. 	
13.	LSA	<p>The CAISO is planning to release a “request for expression of interest,” to help gauge LSE interest in contracting with Idaho wind resources. Interested LSEs would provide a \$10K/MW deposit, refundable after they finalize/submit PPAs “consistent with the amount they are intending to procure” to meet RA obligations.</p> <p>As noted above, LSA questions the different treatment provided in this effort to SWIP-N specifically and Idaho wind resources more generally. Moreover, the CAISO</p>	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		<p>should set forth criteria for how it will treat any “expressions of interest” via the proposed LSE deposits. For example, will the CAISO’s consideration of a certain level of MW deposits be different if that interest is expressed by many vs. only a few LSEs? If the CAISO is modeling this effort on the LCRIF concept, perhaps those existing criteria would provide a starting point.</p>	
14.	NV Energy	<p>NV Energy supports new regional transmission that would allow states to access different renewable resources that may be complementary to the existing resources that have been procured by load serving entities. NV Energy is party to the Transmission Use Agreement (TUA) with LS Power regarding both the potential SWIP-N line and the existing ON Line. Under the TUA, if SWIP-N is constructed, NV Energy is entitled to utilize the first 900 MW of capacity on ON Line. LS Power will receive the next 800 MW of capacity rights on ON Line, and NV Energy and LS Power will each receive half of any capacity beyond 1700 MW. With respect to SWIP-N, LS Power would receive the first 900 MW, and NV Energy would receive the second 700 MW. There are additional provisions dividing the capacity in excess of the first 1600 MW. It is our understanding, and we support CAISO’s position that the rights on the SWIP-N line capacity will be studied in accordance with the capacity designations under TUA.</p>	The comments are noted.
15.	Ormat	<p>The proposed EOI mechanism suffers from the typical chicken/egg problem. LSEs are unlikely to contract with or even consider a “firm” resource that does not have an available path of delivery to California load. Developers are less likely to even consider developing in a region that can’t be delivered. This is particularly an issue for geothermal development, which requires a substantial investment in exploration to identify and develop viable sites. A Field of Dreams approach is a more viable alternative. Adding an approved transmission project to provide firm access for new resources to serve California load will</p>	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		<p>encourage suppliers to focus their development efforts and provide a firm route for LSEs to acquire capacity that provides resource adequacy capacity. As part of an EOI, CAISO could request resource developers to provide information regarding their potential projects and LSEs to note potential interest if only sufficient deliverability was available. Such an expression could include a general description of the potential resources and perhaps include a confidential component with more specific, and proprietary details. Tying the EOI to a substantial deposit would be likely to substantially underestimate the realistic level of interest due to the lack of prior discussion and commitment that has not occurred due to the lack of a viable path.</p>	
16.	PG&E	<p>PG&E requests the CAISO in parallel with the release of the Expression of Interest (EOI) clarify if the proposed \$10,000/MW deposit for North-SWIP will be due concurrently with LSE responses due August 8, 2022, or if not, when would the deposit be due? If the deposit will be due by August 8, 2022, PG&E does not believe the timeline provides adequate time for PG&E to decide on making a financial commitment to OOS wind on any transmission line and receive management and/or CPUC approval and authority to do so. PG&E's ability to make a financial commitment to the EOI process is dependent on understanding more about the process itself.</p> <p>Additionally, PG&E requests that CAISO provide information on the how the proposed \$10,000/MW deposit would be used, what the LSE is making a financial commitment to (e.g., what the terms and conditions are for the deposit). It is also critical that CAISO provides an explanation of what purpose the deposit will serve and what level of commitment (in MWs) from LSEs to a particular transmission line would CAISO need to obtain to make a determination for approval to rate base a transmission line. In addition, PG&E requests clarification of the conditions</p>	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		under which the LSE would receive a refund of their deposit and under what circumstances it would not.	
17.	Pattern Energy	If CAISO feels compelled to move forward seeking expressions of interest for the Idaho wind resources as is described for Proposal A, CAISO may consider moving forward with the process for Idaho wind resources only, rather than moving forward with Proposal A and B resources together. Moving them together in such a compressed timeframe could result in skewed expressions of interest based on potential treatment of one resource and development model over others.	Please refer to response provided in 1.1
18.	Pivot Power Management	We have partnered with BluEarth Renewables US LLC and are proposing several hundred MWs of renewable generation projects on a site just south of the Idaho border in Elko County Nevada. The SWIP North line has easements which pass through our proposed project area, and we are interested in interconnecting into this line. The proposed line would connect this area to additional markets and would alleviate the transmission constraints which are currently prohibitive in the region. The SWIP North Line will bring many renewable energy projects online and connect them to markets that are seeking reliable and low-cost renewable energy.	The comments are noted.
19.	CPUC – Public Advocates Office	Cal Advocates does not have comments at this time.	Noted.
20.	San Jose Clean Energy	SJCE has shortlisted an offer of OOS wind in Idaho which is dependent on Proposal A being adopted, as well as an offer of OOS in New Mexico which would benefit from Proposal B. SJCE strongly supports study of both these alternatives pursuant to existing CAISO TPP rules which provide for projects justified due to reliability needs, economic benefits, and/or supporting progress towards policy goals. SJCE is hopeful OOS wind from Idaho and New Mexico would likely support all three of these goals and welcomes studies to evaluate their relative benefits.	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		<p>SJCE is concerned about the suggestion that LSEs should post security for transmission for OOS wind and suggests removal of this requirement. Requiring a deposit for Proposal A but not Proposal B seems to create an unlevel playing field. LSEs negotiating with out of state wind developers in this region could be at a disadvantage as it creates a barrier to express interest. Additionally, it is not clear what LSEs would receive in return for posting a deposit as compared to those who choose not to post a deposit.</p> <p>Rather than requiring a deposit, CAISO could request available evidence of LSE interest in contracting for OOS resources such as letters of intent, exclusivity agreements, term sheets, power purchase agreements (PPA), attestation of interest or other information about discussions with OOS generators. SJCE would be happy to cooperate with such requests under confidentiality.</p> <p>If the CAISO requires a deposit, it should be refundable regardless of whether an agreement is executed. Otherwise, the CAISO risks skewing LSE competitive solicitations and contract negotiations with OOS wind developers. SJCE requests more information from the CAISO about how it envisions an LSE deposit would work. Lastly, the CAISO should explain whether and how such a provision fits within the CAISO's current transmission planning process and the three types of projects eligible under the existing rules: 1) reliability; 2) economic; and 3) policy.</p>	
21.	SDGE	No comment	Noted.
22.	Shell Energy	We support the exploration of proposal A and a mechanism to determine interest by stakeholders. The proposed \$10,000/MW for a refundable deposit strikes us as a bit steep; we would suggest a \$2500/MW refundable deposit strikes a better balance.	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
23.	Southwestern Power Group	<p>As SWPG previously stated in its comments to the Draft 2021-2022 Transmission Plan, an open season for interest in accessing Idaho wind should be primarily directed towards prospective generators who could potentially subscribe to transmission capacity on the SWIP North line, as opposed to the load-serving entities (LSEs) who would not subscribe to transmission capacity but would procure energy and capacity from the generators. The generators in turn would only show interest in subscribing to capacity on the line if they believed there were a viable opportunity to market energy and capacity to the LSEs. Therefore SWPG again recommends that the CAISO primarily direct the open season to prospective generators. It is worth noting that LS Power also advocated for this approach in its comments to the Draft 2021-2022 Transmission Plan.</p> <p>As part of Proposal A CAISO also suggests the possibility of having LSEs make a deposit of \$10,000/MW which could later be refunded if the LSEs execute a PPA for Idaho resources to use towards meeting their RA obligations. It is difficult to evaluate this proposed deposit level since the LSE would be executing its PPA with a generator and not with the SWIP North line itself, and would not be in position to evaluate the specific terms and conditions of a PPA at this time. Here again it would seem more logical for prospective generators to make deposits towards funding a new transmission line similar to how a generator could be required to finance network upgrades needed to deliver the output of its project if it were connecting to the existing CAISO footprint.</p>	Please refer to response provided in 1.1
24.	Stop Lava Ridge	The organization that I represent, www.stoplavaridge.com , is requesting that CAISO does not provide any funding or assistance to LS Power (aka Magic Valley Energy, LLC) for the SWIP-North transmission projects in Idaho. LS Power is seeking approval from the Bureau of Land Management for two wind projects to be located on	The comments are noted.



No	Comment Submitted	CAISO Response
	<p>approximately 150,000 acres of public lands and encompassing four counties in Southern Idaho.</p> <p>Is your organization aware of the universal opposition to the proposed projects, known as Lava Ridge (Jerome, Lincoln, Minidoka counties) and Salmon Falls (Twin Falls county)? These two wind projects are not wanted, nor welcomed by the surrounding communities. The Stop Lava Ridge Facebook page has almost 2400 members and adds members every day. In a two week time period, we were able to obtain over 1000 signatures on a petition that expresses opposition. We have held several townhall-style meetings, with hundreds in attendance. Our legislators, congressional delegation, and county commissioners have received hundreds of letters, phone calls, and texts, all expressing opposition to the wind projects. On July 7th, the Twin Falls County Commissioners unanimously passed a resolution opposing the Salmon Falls wind project; individual county commissioners in Jerome, Lincoln, and Minidoka counties have publicly expressed their opposition to the Lava Ridge project, and will likely pass their own resolutions of opposition once the Environmental Impact Report is completed.</p> <p>Here are several reasons why these projects are not welcomed in the Magic Valley: the location of the turbines will be on top of our aquifer (one of the largest in the US), and will threaten our water supply; the Minidoka National Historic Site (Japanese Internment Camp) adjoins the land - the wind turbines will interfere with the solemn atmosphere and visual picture of this important memorial. The Japanese-American community has already been disgracefully treated once by our country - don't let them be abused a second time; the land where the proposed wind turbines will be located contains a rich, vibrant, sensitive ecosystem. - this land provides vital sage grouse habitat, wintering ground for deer, elk,</p>	

No	Comment Submitted	CAISO Response
	<p>and antelope, and important habitat for eagles, raptors, bats, and many other animal species. Both locations contain many Native American artifacts and archaeological sites; the livelihoods and grazing rights of generations of ranchers will be negatively impacted - there are no other places to relocate their herds to and replacement forage is scarce. Aerial fire suppression methods will not be able to be used, per the FAA, in the likely event of wildfires on BLM land. And hundreds of giant wind turbines will forever mar our beautiful landscape in Southern Idaho.</p> <p>If you would like to hear from the communities that will be impacted, we could organize a townhall-type of event, whether in person or via a Zoom meeting. In attendance would be staff of our congressional delegation, county commissioners, legislators and hundreds of people.</p> <p>Please give our thoughts consideration in your decision making process.</p> <p>Thank you, Joan Hurlock (208)539-5395</p> <p>Stop Lava Ridge</p>	
25.	TransWest Express LLC	See our response to item 1. Noted.

3. Please provide your organizations specific comments on Proposal B

No		Comment Submitted	CAISO Response
1.	ACP - California	ACP-California appreciates that CAISO has expanded this process to include consideration of wind resources in areas other than Idaho. However, at this stage, it is not clear what an expression of interest in Wyoming, New Mexico or Arizona by a California LSE would indicate. For instance, would LSEs be asked to indicate their level of interest in capacity with any qualifications including around resource price or whether the generation would ultimately be considered part of the CAISO BAA or would be imported RA? And would that interest be differentiated between whether the transmission necessary to deliver the wind resources to CAISO was included in the TAC or not? These are likely important considerations for LSEs and will strongly influence the level of interest that is expressed for these resource areas. We again urge CAISO to reconsider having two different processes and to find a consistent approach for gathering interest from LSEs in wind across the region.	Please refer to response provided in 1.1
2.	Arevia Power	Arevia Power has not further comments.	Noted.
3.	Arizona Electric Power Cooperative (AEPCO)	See comments on Proposal A.	Noted.
4.	Bay Area Municipal Transmission Group (BAMx)	See the response to Q.2 above.	Noted.
5.	California Community Choice Association	Beyond the clarifications requested in (2) and (4) related to the different approaches for Proposal A versus Proposal B and how the results of the expressions of interest will result in project approvals, CalCCA has no additional comments on Proposal B at this time.	Noted.
6.	Cat Creek Energy LLC	N/A	Noted.
7.	East Bay Community Energy	EBCE is interested in wind assets in Wyoming, New Mexico, and Arizona and supports transmission development to connect these generation-rich regions with California load. If cost causation principles justify deposits on Idaho wind resources, EBCE would assume that the same cost causation principles would	Please refer to response provided in 1.1

No		Comment Submitted	CAISO Response
		be applied to all other out of state wind resources regardless of their location.	
8.	EDF – Renewables	EDF-R supports the CAISO’s proposal to explore transmission development opportunities to enable wind located in various states including Wyoming, New Mexico, and Arizona.	The comments are noted.
9.	Fervo Energy Company	No comment.	Noted.
10.	Friends of Minidoka and partners	None	Noted.
11.	Geothermal Rising	It would seem reasonable for the same type of EOI mechanism implemented for Proposal A to be used for the other projects as well.	The comments are noted.
12.	LS Power Development, LLC	While the board approved Transmission Plan for 2021-22 does not require an evaluation of Proposal B, LS Power agrees with CAISO’s remark in the June 27 th meeting that stakeholders’ feedback on Proposal B could be a useful input to inform future planning work in subsequent TPPs.	The comments are noted.
13.	LSA	<p>Like Proposal A, CAISO plans to release a “request for expression of interest,” to help gauge LSE interest in contracting with wind resources from “various states, including Wyoming, New Mexico, and Arizona.”</p> <p>The Paper does not mention specific deposits or other monetary commitments. Instead, this “broader proposal encompassing many states” seems intended to help CAISO gauge relative interest in different sources and transmission proposals, to “understand if there are particular transmission projects” the CAISO should “prioritize in its review and consideration process.”</p> <p>Again, LSA questions the different treatment of transmission projects that would access these other promising areas and reserves judgment about this proposal pending further development.</p>	The comments are noted.
14.	NV Energy	NV Energy has no comments on Proposal B.	Noted.
15.	Ormat	Ormat recommends that the same mechanism used for SWIP North be applied the other potential routes.	The comments are noted.

No		Comment Submitted	CAISO Response
16.	PG&E	See PG&E's response to Question 1.	
17.	Pattern Energy	<p>CAISO should recognize the diversity of resources and models used by various wind and transmission developers and take time to develop a more general process for gathering expressions of interest on regional renewable resources in a manner that promotes competition and respects the various transmission development models that exist throughout the region.</p> <p>General expressions of interest/RFIs may be useful to assess interest in regional wind down the road, but the CAISO should gather more stakeholder feedback on the level of detail to be sought in the process, and should not rush the "Proposal B" process without further discussion and consideration of the various transmission development models.</p>	Please refer to response provided in 1.1
18.	Pivot Power Management	As our projects are not located in Idaho, they could fall under Proposal B, though they would be connected to a line which is intended to connect CAISO to Idaho resources, the same line would allow resources which are located along its path to interconnect, dramatically increasing the areas where projects could feasibly be built. There are substantial areas with moderate to high resource and little to no load which could be utilized to serve CAISO customers.	The comments are noted.
19.	CPUC – Public Advocates Office	Cal Advocates does not have comments at this time.	Noted.
20.	San Jose Clean Energy	SJCE is in discussions with an OOS wind generator with a project in New Mexico and has an existing PPA with New Mexico wind that could potentially benefit from additional transmission in the region.	The comments are noted.
21.	SDGE	No comment	Noted.
22.	Shell Energy	We support the exploration of proposal B and a mechanism to determine interest by stakeholders. We suggest the CAISO rank transmission projects considered under proposal B using two factors: 1) which projects enable the greatest amount of new transfers with the lowest cost and 2) which projects	The comments are noted.

No		Comment Submitted	CAISO Response
		would increase inter-regional diversity benefits under a single or multiple Western RTO(s). The CAISO should not foreclose the possibility of funding (and possibly authorizing) projects related to proposal B in a joint manner with other TSPs, should there be benefits for CA ratepayers and another willing TSP.	
23.	Southwestern Power Group	As stated in response to question #1, SWPG believes it is not necessary at this time to conduct a solicitation for interest in accessing wind resources from Wyoming, New Mexico and/or Arizona, and therefore CAISO could move forward with Proposal A alone at this time. There are still merits to gauging for commercial interest in accessing wind from these other areas, but perhaps through a separate process with more time to accommodate the different design elements of the respective transmission solutions.	The comments are noted.
24.	Stop Lava Ridge	No comments	Noted.
25.	TransWest Express LLC	See our response to item 1.	Noted.

4. Please provide any additional comments your organizations would like to make to help inform the CAISO and this initiative

No		Comment Submitted	CAISO Response
1.	ACP - California	ACP-California is grateful that CAISO is moving forward with soliciting and understanding interest in regional wind resources. These diverse resources have the potential to offer substantial benefits to CAISO and its LSEs. However, this process is critically important and requires careful consideration prior to moving forward. In particular, we have concerns around the proposal to treat Idaho wind separately from wind in other regions. We suggest CAISO take an additional period to hold stakeholder workshops to review how best to gather information and interest in wind resources (and associated transmission projects) across the West in a manner that promotes resource diversity and competition, while providing a level playing field for various projects. Doing so may help position this process as a model to be used for transmission project development via solicitation. We look forward to working with CAISO on this effort and reiterate our appreciation for CAISO's continued efforts on transmission planning.	The comments are noted.
2.	Arevia Power	Arevia Power has not further comments.	Noted.
3.	Arizona Electric Power Cooperative (AEPCO)	As stated above, Anza supports CAISO's initiative to pursue access to OOS wind resources. This support is amplified if building transmission to access OOS wind resources is a more cost-effective solution than building transmission and resources within the state of California. Additionally, Anza seeks more information on two items: (1) Information on the import allocation rights (MIC) question raised above; and (2) what capacity accreditation methodology (ELCC/NQC) will be used for OOS wind resources (regional, state-specific, site-specific, etc.).	Please refer to response provided in 1.1. The ISO will be using ELCC values for resources as provided by the CPUC. The CPUC's regional wind effective load carrying capability study results for 2024 can be found at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M482/K148/482148586.PDF
4.	Bay Area Municipal Transmission Group (BAMx)	The CAISO plans to release a request for expressions of interest to help the CAISO gauge interest from LSEs in contracting with OOS wind resources from Idaho, Wyoming, New Mexico, and Arizona. To get a meaningful response from the LSEs in the CAISO footprint, BAMx recommends that CAISO provides	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>some specificity in framing its questions. In particular, the CAISO needs to provide guidelines to LSEs, where the LSEs need to identify the general location of the OOS wind resources and their expected dependency on the related transmission projects, their scope, and costs. For instance, it is possible that some of the Arizona wind resources can be accommodated on the existing or approved transmission projects. In contrast, wind resources elsewhere in Arizona cannot access California markets without new transmission. And, LSEs' response to CAISO's expression of interest should be able to make that distinction. In the expression of interest, the CAISO also needs to seek clarity from LSEs on whether and how they have incorporated the cost of transmission in their decision making. Without such information, CAISO will be unable to meaningfully process the LSE response in their interest in certain OOS wind resources.</p> <p>Furthermore, suppose any LSE is expressing interest in contracting OOS wind resources. In that case, the underlying presumption is that it perceives those OOS wind resources as more cost-effective as part of its own resource portfolio than the competing in-State and offshore wind resources. BAMx recommends that CAISO's inquiry seek clarity from LSEs on the resources, transmission, and integration cost aspects of their decision-making. For example, if any LSE responds that it is interested in contracting 100MW of wind resources in Idaho, this response, by itself, does not provide any insights into the transmission cost assumptions made by that LSE to access 100MW of wind resources in Idaho. Therefore, without more information, the CAISO will not be able to meaningfully process the interest and level of commitment responses from the LSEs, that ultimately helps determine if the state should move forward with funding specific OOS transmission projects required to access OOS wind resources.</p>	

No		Comment Submitted	CAISO Response
5.	California Community Choice Association	<p>The CAISO should further explain how it will use expressions of interest for both Proposal A and Proposal B to drive the approval of transmission projects. Specifically, will the CAISO consider the resource potential of other resource types (beyond just wind) that exist out of state in similar locations? To assist in this endeavor, the CAISO could expand the expressions of interest to glean information about where LSEs are seeing potential opportunities for other resources beyond wind that could use the same transmission path. Additionally, how will the results of the expressions of interest interact with the CAISO's standard planning assessments undertaken in each TPP cycle (<i>i.e.</i>, the reliability, economic, and policy assessments)? In the economic assessment in the 2021-2022 TPP, the CAISO found insufficient economic justification to move forward with the projects. How will the CAISO use the results of the expressions of interest to supplement the existing economic or policy-driven study results from the 2021-2022 TPP to decide which projects to add to the rate base?</p>	Please refer to response provided in 1.1
6.	Cat Creek Energy LLC	<p>Time is of the essence. California currently relies on Pacific Northwest hydropower supply for resource adequacy and resiliency that is rife with uncertainty. Variables include:</p> <ul style="list-style-type: none"> • Columbia River Treaty negotiations, • Lower Snake River Dam removal proposal, • Aggressive Oregon and Washington clean energy mandates, • PNW investor owned and public power utility 100% carbon free goals, • Electric cooperatives in Oregon, Washington, Idaho and Montana looking for renewables and RA to replace BPA power, 	The comments are noted.

No	Comment Submitted	CAISO Response
	<ul style="list-style-type: none"> • Activation of the Western Energy Imbalance Market (WEIM) and the Western Resource Adequacy Program (WRAP), • New tribal authority rulings, • Increasing temperatures that increase PNW electrical demand (last year's 106 temps in western Washington) and, • Drought affecting aquatics and lowering power supply of the once through hydro system. <p>California LSEs should act quickly to lock in the valuable Idaho resource adequacy and resiliency. The bidirectional SWIP-N line and Cat Creek Energy allows California LSEs in one sweep to access valuable Idaho renewables while taking advantage of the unique opportunity to turn currently curtailed California renewables into a reliable resilient product.</p> <p>This examination Out-of-State Resources does not stand alone. It comes in tandem with FERC’s Notice of Proposed Rulemaking (NOPR) on transmission system planning performance standards for extreme weather events. Idaho resources and the services of Cat Creek Energy can serve California markets through largely uninhabited swaths of mostly public lands in a north-south Idaho and Nevada SWIP-N route that is parallel but safely away from the extreme heat and cold weather and congested West Coast transmission corridor that runs through northern California. Idaho resources, Cat Creek Energy and the SWIP-N line are easy mitigation actions to address the reliability gap in the Bulk Power system planning that the NOPR proposes to correct by directing NERC to develop modifications to Reliability Standard TPL-001-5.1.</p> <p>Idaho resources further a just energy transition for Californians. It is a tenet of Energy Justice that enhanced system operation lowers peak demand and</p>	

No	Comment Submitted	CAISO Response	
	<p>leads to a reduction in the energy burden on consumers. The value of the SWIP-N, and the Idaho resource Cat Creek Energy's Energy Storage is that it can respond to peak demand daily by using otherwise curtailed California variable renewable resources to address system reliability at the Macro level, providing cost reduction benefits to all California consumers.</p> <p>California Public Utilities Commission is currently responding to blackouts caused by extreme weather by funding energy storage at the community level. Its \$1 billion Self-Generation Incentive Program (SGIP) with special targeting mechanisms for disadvantaged communities addresses issues at the micro level. Cat Creek's energy storage can fill reliability gaps at the Bulk Power System level when extreme weather events affect the power infrastructure. Based on its innovative design, CCE could have provided up to one-third of the power for five days in the 2020 heatwave that caused blackouts in California.</p>		
7.	East Bay Community Energy	<p>EBCE encourages the CAISO to monitor the CPUC's 2022 Integrated Resource Plan (IRP) process and review the conforming and preferred portfolios submitted by CPUC-jurisdictional LSEs. Given the aggressive emissions reduction goals of California LSEs and the renewable energy goals of many California CCAs, including time-coincidence of renewable and/or carbon-free generation to CCA demand, EBCE believes CAISO will have reason to conduct a variety of IRP sensitivities requiring larger volumes of new transmission capacity as part of future TPP studies.</p>	The comments are noted.
8.	EDF – Renewables	<p><u>Prioritization</u></p> <p>If CAISO has limited staff or resources to perform the evaluation of these proposals, EDF-R suggests CAISO prioritize the evaluation of proposals based on standardized criteria that includes level of interest (from developers and Load Serving Entities), maturity of the proposal, expediency, or construction, etc. The</p>	Please refer to response provided in 1.1

No	Comment Submitted	CAISO Response
	<p>proposal that are more mature and are more likely to be constructed in a mid-term timeline (4-7 years) should be prioritized. In addition, EDF-R recommends CAISO review additional transmission opportunities that would facilitate the delivery of NM wind resources.</p> <p><u>Deliverability</u></p> <p>Regarding Maximum Import Capacity (MIC), EDF-R has heard CAISO mention in other venues that MIC will have to increase to support the resource mix currently planned in CAISO and CPUC's long term supply plans. EDF-R requests CAISO provide in the next turn of this proposal an explanation of how a MIC increase could or will be available to support LSE commitments to contracting on any proposed transmission.</p> <p>Furthermore, there should be an evaluation of what network upgrades are required within CAISO footprint to ensure deliverability of the resources delivered via any out-of-state transmission project. Absent upgrades within CAISO footprint, curtailment of clean energy resources will increase. The CAISO's recent 20-year assessment has identified the need for several key upgrades required for reliability and deliverability of clean energy resources. For instance, clean energy resources delivered at the Southeast border of the CAISO system will be impacted by lack of transmission on the 500kV corridor between Colorado River and Devers. The CAISO 2022 Transmission Plan Deliverability study showed there was 0MW of deliverability for new resources to the CAISO system from this region. There are no new transmission facilities planned in this region and therefore resources delivered at the CAISO border will be facing similar deliverability challenges. It is therefore critical that any</p>	

No		Comment Submitted	CAISO Response
		<p>grid study holistically addresses the deliverability needs for any imported resources.</p> <p><u>An alternative deposit approach</u></p> <p>Regarding CAISO's proposed LSE commitment via deposit strategy, EDF-R suggests that the \$10,000-per-MW deposit approach may be a difficult cost for smaller LSEs, and EDF-R suggests that an alternative approach could be a staged deposit strategy could be a reasonable – for example the per-MW deposit could increase at various milestones:</p> <ul style="list-style-type: none"> • Start with \$2,000 per MW for Engineering • Increase to \$4,000 per MW for Procurement • Increase to \$10,000 per MW for Construction <p>The deposit would still be refundable upon submission of a PPA, as in CAISO's proposal.</p>	
9.	Fervo Energy Company	Fervo Energy implores the CAISO to look beyond out-of-state wind and consider the suite of other generation resources that may be procured by LSEs with Proposal A. Fervo Energy looks forward to reviewing stakeholder comments and continued participation in the 2021-2022 Transmission planning process.	The comments are noted.
10.	Friends of Minidoka and partners	Thank you for considering our views.	Noted.
11.	Geothermal Rising	While it is not a component of this initiative, from an equity perspective CAISO should consider some mechanism to better account for the benefits of baseload renewable resources versus less energy dense wind or solar resources. At the very least, some kind of capacity component should be implemented for interconnecting resources. The current practice of calculating refunds of deliverability network upgrades deposits in the interconnection process favors lower capacity factor resources. For example, a 100 MW geothermal resource can deliver roughly 800,000 MWh annually, for which CAISO load	The comments are noted.

No		Comment Submitted	CAISO Response
		<p>pays a \$/MWh TAC. The same 100 MW wind resource, which uses the same amount of transmission capacity, generates roughly 300,000 MWh, and provides less than 40% of the TAC revenue of the geothermal resource. However in both cases, the generator receives the same five-year refund of its network upgrade costs which in effect subsidizes the wind resource. Geothermal Rising recommends that the CAISO undertake an initiative to correct this inequity. Additionally, reassessment of TAC billing methodology reform that accounts for more effective utilization of transmission capacity, should be considered.</p>	
12.	LS Power Development, LLC	<p>In terms of evaluating the level of interest, a bright line test on number of MWs of interest may not be the best approach. Instead, a qualitative assessment of whether interest exists may be a better approach especially given the broad ranging reliability, resiliency, economic, and policy benefits a transmission project such as SWIP North can provide. More specifically, SWIP North can provide significant benefits to California including:</p> <ul style="list-style-type: none"> • Access to more than 1,000 MW of Portfolio Content Category 1 (PCC1) eligible energy and associated Renewable Energy Credits (RECs) from diverse sources in Idaho & surrounding states. • Mitigation of near term supply shortfalls due to its advanced stage of development and ability to be placed in service in 2025. • Increased reliability benefits due to supply diversity (geographic and resource type), which also reduces dependency on fossil fueled resources and reduces greenhouse gas emissions. For example: <ul style="list-style-type: none"> ○ Idaho wind produces more energy in the morning and evening ramping hours, 	The comments are noted.

No		Comment Submitted	CAISO Response
		<p>supplying the grid with electricity when it needs it most.</p> <ul style="list-style-type: none"> ○ Nevada geothermal provides dependable capacity and is not intermittent. ○ Reduced costs through increased low-cost energy imports. ● Mitigation of reliability risks associated with delivery of Pacific Northwest (PNW) imports during wildfire related or other derates on the California-Oregon Intertie (COI)/Path 66 and the Pacific DC Intertie (PDCI). ● Reduced congestion on parallel paths, such as COI. ● Enhanced EIM benefits. ● Enables exports of excess energy out of California, reducing renewable curtailments. 	
13.	LSA	LSA has no additional comments at this time.	Noted.
14.	NV Energy	NV Energy has no additional comments.	Noted.
15.	Ormat	<p>The geothermal industry is poised to develop significant technological advances to substantially increase its potential in the West, providing clean, renewable baseload generation that is not subject to the vagaries of the weather. While choosing among alternatives to meet environmental and reliability needs, CAISO should consider the benefits of a more diverse portfolio in its planning process. One MW of geothermal can provide as much energy as 3 MW of wind or 4 MW of solar. shouldn't it be valued accordingly? The more timely value of SWIP-North and ability to open up even more development sooner warrants consideration.</p>	The comments are noted.
16.	PG&E	PG&E has no additional comments at this time.	Noted.
17.	Pattern Energy	<p>Thank you for your attention to these important matters. Regional renewables are critical to the CAISO system and we encourage the CAISO to explore a number of different pathways to ensure increased renewable resource delivery to California.</p>	The comments are noted.

No		Comment Submitted	CAISO Response
18.	Pivot Power Management	Outside of California, transmission capacity is one of the largest barriers to renewable development the industry faces today. With these proposed transmission projects and the SWIP North line, the pool of renewable generation will continue to grow due to the strategic placement of these lines throughout the region. We appreciate the opportunity to listen in on the June 27 th call and to provide comments on the projects discussed. We look forward to seeing these transmission projects come to fruition.	
19.	CPUC – Public Advocates Office	Cal Advocates does not have comments at this time.	Noted.
20.	San Jose Clean Energy	SJCE is supportive of cost-effective new transmission projects connecting to California and appreciates the CAISO undertaking these stakeholder engagements. SJCE also understands the importance of prudent planning to moderate the substantial recent increases in transmission costs for California ratepayers.	The comments are noted.
21.	SDGE	No comment	Noted.
22.	Shell Energy	We suggest the CAISO should allow for stakeholders to redact/anonymize certain information which may be commercially sensitive in nature related to any public release of expressions of interest for either proposal A and/or B.	Financial information may be redacted from the documentation provided by the LSEs in response to the ISO's request for expressions of interest. However the ISO must note that unless information is marked confidential by LSEs, the ISO, at its sole discretion, may share responses to this REOI and supporting documentation provided by the LSEs with the public and appropriate regulatory authorities including, but not limited to, the FERC and the CPUC.
23.	Southwestern Power Group	None.	Noted.
24.	Stop Lava Ridge	No comments	Noted.
25.	TransWest Express LLC	No additional comments at this time.	Noted.