

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Establish
Policies, Processes, and Rules to Ensure
Reliable Electric Service in California in the
Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003
(Filed November 19, 2020)

**AMERICAN CLEAN POWER – CALIFORNIA RESPONSE TO E-MAIL RULING
SEEKING RESPONSES REGARDING A PROPOSED AMENDED SCOPE AND
SCHEDULE TO ADDRESS RELIABILITY ISSUES IN 2022 AND 2023**

August 6, 2021

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In accordance with the August 2, 2021 E-Mail Ruling Seeking Responses Regarding a Proposed Amended Scope and Schedule to Address Reliability Issues in 2022 and 2023, American Clean Power – California (“ACP-California”) respectfully offers the following comments on the potential list of items to be included in the scope of an amended scoping ruling to this proceeding.

I. Proposed Amended Scope

ACP-California appreciates the urgent refinements to the scope of this proceeding based on the Governor’s Emergency Proclamation, issued on July 30, 2021. In addition to the items currently scoped into the proceeding, ACP-California suggests several additional items to ensure connectivity between near-term emergency actions and mid-term reliability. The refinements and modifications discussed below seek to provide immediate next steps to build upon the robust scope of this proceeding, and to enable successful implementation of the 11,500 GW mid-term reliability procurement ordered in D.21-06-035.

A. Ensure timely interconnection of new clean capacity

Interconnections are essential to bringing the benefits of new clean capacity to market and must be included in the scope of this proceeding. Without significant coordinated effort on

behalf of the Commission, California Energy Commission, CAISO, transmission owners, and market participants, most of the actions will not actually contribute to near-term reliability needs.

1. The Scope Should Extend to Prepare for Mid-Term Reliability in 2023-2026.

While the emergency proclamation is rightfully focused on immediate needs for reliability given the likelihood of extreme weather and additional pressures on the electricity system due to the worsening drought and fire season, it will be important to extend these actions to mid-term and longer-term electricity sector transformation. This would include accelerating least-regrets transmission upgrade approvals and transmission studies and incorporate information from the 2021-2022 Transmission Planning Process (“TPP”) into current procurement proceedings.

a. Accelerate transmission approvals.

The CPUC should consider broadening the scenarios for study in the current and upcoming cycles of the TPP to enable more robust modeling and more optionality for additional transmission capacity in the next several years. Transmission upgrade approvals have already experienced an unacceptable degree of delay and uncertainty, which can threaten project viability. Doing so will enable deliverability of new clean capacity and provide greater market certainty to LSEs and project developers engaging in procurement associated with mid-term reliability procurement.

b. Expedite transmission studies and incorporate current information from the TPP into expedited procurement.

Specifically, as the proposed revised scope considers expedited procurement, the Commission should consider incorporation of current information into the upcoming Preferred System Plan decision in the IRP proceeding in order support ongoing coordination with the Transmission Planning Process. By ensuring that this cycle of the IRP includes the most recent

transmission planning and reliability studies prepared in the 2021-22 TPP cycle, the CPUC will better enable near-term transmission solutions that may provide additional deliverability on the system.

II. Conclusion

ACP-California appreciates the opportunity to respond to the scope of issues for the next phase of this important proceeding and suggests the considerations and actions described above to ensure that any new procurement can actually be interconnected, deemed deliverable and be available to grid operators to meet near term reliability.

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Respectfully submitted,

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