BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA


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

AMERICAN CLEAN POWER – CALIFORNIA OPENING COMMENTS ON PROPOSED PHASE 2 DECISION DIRECTING SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY TO TAKE ACTIONS TO PREPARE FOR POTENTIAL EXTREME WEATHER IN THE SUMMERS OF 2022 AND 2023

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November 10, 2021
SUMMARY OF RECOMMENDATIONS

1. ACP-California recommends authorizing a new AB 970 oversight process.

2. Investigate whether the IOUs have sufficient resources to meet their obligations in the interconnection process.

3. Evaluate revisions to General Order 131-D to expedite transmission projects in existing corridors.

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ACP-California appreciates the Commission’s recognition of the need for California investor-owned utilities (“IOUs”) to undertake immediate actions to ensure reliable electric service in California during the summers of 2022 and 2023. However, ACP-California is concerned that the Proposed Decision focuses almost exclusively on sourcing emergency power supplies and neglects to adopt simple recommendations that could help expedite the interconnection and construction of generation projects already in the California Independent System Operator (“CAISO”) queue and address the current and future challenge posed by delays in interconnection and transmission development.
I. Introduction

ACP-California, the California project of American Clean Power, represents companies from across the clean power sector that provide cost-effective solutions to the climate crisis while creating jobs, spurring investment in the American economy, and driving high tech innovation in California and across the United States. ACP-California’s mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system.

On October 29, 2021 Administrative Law Judge Sarah R. Thomas issued a Proposed Decision adopting several supply- and demand-side measures to ensure there is adequate electric power in the event of extreme weather in the summers of 2022 and 2023. These recommendations are supported by Governor Newsom’s July 30, 2021 Emergency Proclamation calling on the Commission, the California Energy Commission (“CEC”) and CAISO to accelerate plans for “construction, procurement, and rapid deployment of new clean energy and storage projects” to meet a need for 2000-3000 megawatts in additional resources. In identifying this need, the Proposed Decision acknowledges procurement already authorized in Integrated Resource Planning (“IRP”) procurement decisions for 2022 and 2023, but finds that a variety of uncertainties and obstacles pose a “real potential for delays.” Some of the challenges identified in the Proposed Decision, such as global supply chain issues, may be beyond the Commission’s power to solve. Other issues, such as on-line timeline issues and interconnection queue limitations are not. The Commission should do more than merely identify issues that may delay the interconnection of already-authorized IRP resources. It should adopt actions to address them.

1 PD at p. 6.
2 PD at pp. 18-19.
A number of parties, including ACP-California, recommended immediate steps the Commission could take to more effectively identify and address the root causes of project delays and expedite the interconnection of Cluster 13 and 14 projects. The Proposed Decision should have included these straightforward actions as a cost-effective complement to other supply and demand side resource procurement recommendations.

II. The Proposed Decision errs in bypassing simple measures to improve procurement transparency and accountability.

The Proposed Decision includes a relatively detailed discussion of the CEC 2022 Summer Stack Analysis and other inputs to its determination of the need for additional 2022-2023 procurement. A missing element is analysis of what actions the Commission (by itself or in coordination with CAISO) could do in the near term to address factors currently delaying completion of transmission upgrades and interconnection of IRP resources already in the queue. ACP-California agrees with the Proposed Decision’s admonition that “permanent changes to the Commission’s RA program requirements and longer-term planning standards should be made in the RA and IRP proceedings, respectively.” At the same time, the Commission can order steps in this proceeding that could immediately improve Commission access to timely information on utility infrastructure work that may be delaying interconnection of critical resources.

The Proposed Decision should be modified to adopt the recommendation of ACP-California to improve the AB 970 reporting process by creating additional oversight and accountability. This would provide consolidated, reliable and up-to-date information on the status and timing of network upgrades that is not readily available elsewhere. It would provide

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3 PD at pp. 13-29.
4 PD at p. 15.
5 ACP-California Opening Brief at pp.3-4.
the Commission with a tool that can be used to identify the cause of potential delays more quickly and accurately, and to rectify them to the greatest extent possible.

Specifically, the Proposed Decision should authorize:

- A new AB 970 oversight process, to be initiated within 60 days of the effective date of the final decision.

- IOU submission of quarterly updates of their AB 970 reports, coordinated with a quarterly workshop to discuss the reports.

- Assignment of one or more Energy Division staff members to review and validate the IOUs’ reporting under AB 970, and to follow up with transmission owners if timelines begin to slip.\(^6\)

These simple actions would immediately enable the Commission to provide greater oversight and help address the delays that have been identified as one direct cause of the current 2022-2023 supply shortfall.

III. The Proposed Decision overlooks actions the Commission could take immediately to expedite interconnection of projects.

A significant portion of the renewable and energy storage resources needed to address the 2022-2023 shortfall could be expedited by addressing delays in transmission upgrades that have already been approved through established CAISO processes.\(^7\) The Proposed Decision’s analysis of the problem and potential actions it could take to address the problem is cursory and inadequate.\(^8\) While many parties may agree that “project development timelines” and tight supply chains make accelerating the interconnection and construction of projects difficult, it is the Commission’s responsibility to take what actions it can. Such actions may include:

- Immediately investigating whether the IOUs have sufficient engineering resources to meet applicable timelines and potentially accelerate the engineering phase of approved transmission projects.

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\(^6\) See Exh. ACP-01 at pp. 3-4.
\(^7\) See Exh. ACP-01 at p. 5.
\(^8\) PD at p. 108.
• Authorizing funding if needed to provide the IOU engineering resources required.

• Considering revisions or clarifications to General Order 131-D to ensure that transmission upgrade projects that are primarily within existing corridors can proceed through a notice of construction.

• Adopt SDG&E recommendations for addressing obstacles in completing projects in the CAISO queue, including development of a process to screen which generation resources can be expedited as energy-only resources now, while providing a means and timeline adjustments needed to enable the resources to achieve full deliverability status when possible, and working with CAISO to streamline the Cluster 13 and 14 interconnection process (while ensuring fairness to queued projects).9

Analyzing and seeking out near-term actions that could help support the expedited construction of transmission upgrades and the interconnection of projects currently in the queue is not as simple as authorizing additional procurement. But focusing on this effort should be a priority, as it is the least costly and best approach to addressing the immediate challenge of ensuring adequate resources for summer 2022 and 2023.

Dated: November 10, 2021

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9 See Exh. ACR-01 at 4-5; Exh. SDG&E-7 at 10-12.