



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

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Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

Rulemaking 20-05-003  
(Filed May 7, 2020)

**AMERICAN CLEAN POWER – CALIFORNIA  
NOTICE OF EX PARTE COMMUNICATION**

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November 24, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Order Instituting Rulemaking to Continue  
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NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, American Clean Power – California (“ACP-California”) provides notice of an oral ex parte communication, conducted via conference call. ACP-California initiated the meeting to discuss transmission availability at Diablo Canyon, offshore-wind development, and the Integrated Resource Planning (“IRP”) process.

On November 23, 2021, beginning at 1:30 p.m., Danielle Mills, Director of ACP-California, Gabe Tabak, Counsel for the American Clean Power Association, Brian Biering, Attorney for ACP-California, and Varner Seaman, Offshore Wind Program Director for ACP-California met with Christina Tan, Energy and Telecommunications Advisor for Commissioner Shiroma.

ACP-California discussed the IRP proceeding and the need to send signals for long-lead time resources, such as Offshore-Wind (“OSW”). The Morro Bay / Diablo area is best suited for near-term OSW development, and ensuring that the transmission deliverability at Diablo is available when OSW comes online will provide much needed certainty to facilitate development over the next several years.

ACP-California discussed the technical potential and viability on the California coast, both in Morro Bay and the Humboldt call areas and discussed the latest plans for leasing federal sea space. ACP-California expects that sea space accommodating roughly 4.6 GW of development is

likely to move forward with potential lease sales conducted by the Bureau of Ocean Energy Management in Fall of 2022. ACP-California discussed how the Morro Bay call area is particularly attractive for development because it doesn't require significant new transmission build-out.

ACP-California outlined the proposal it made in responding to the recent Preferred System Plan ("PSP") ruling and explained that the PSP for the 2019-2021 IRP cycle could play an important role in preserving the Diablo transmission capacity. ACP-California encouraged the Commission to establish a framework for Pacific Gas and Electric Company's ratepayers to continue to receive value from the Diablo facilities, while at the same time ensuring that the transmission capacity is available when projects in the Morro Bay call area come online. ACP-California continues to recommend that the Commission use the PSP to present a policy case for OSW development in the Central Coast, and that the Commission specifically request the California Independent System Operator ("CAISO") study making transmission capacity available to OSW development in the 2022-2023 Transmission Planning Process. The Commission and CAISO could then seek a limited waiver of the tariff provisions governing the deliverability allocation procedure to ensure that the transmission capacity would be preserved for OSW development. ACP-California noted Federal Energy Regulatory Commission ("FERC") precedent for this type of waiver, such as a recent waiver of the interconnection service rights rules in the New York Independent System Operator ("NYISO") where a NYISO market participant was allowed to extend the duration of its capacity rights while transitioning thermal generation to energy storage resources.<sup>1</sup> ACP-California concluded the meeting by discussing the importance of having near-term policy signals for OSW development in the current IRP cycle.

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<sup>1</sup> See *Helix Ravenswood, LLC*, 170 FERC P 61022 (2020).

DATED: November 24, 2021

Respectfully submitted,

/s/ Danielle Osborn Mills

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