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 14, 2020)

REPLY COMMENTS OF HORIZON WEST TRANSMISSION LLC ON THE PROPOSED DECISION TRANSMITTING ELECTRICITY RESOURCE PORTFOLIOS TO THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR FOR 2025-2026 TRANSMISSION PLANNING PROCESS

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Dated: February 4, 2025

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A. INTRODUCTION

Pursuant to the Administrative Law Judge's Proposed Decision Transmitting Electricity Resource Portfolios for 2025-2026 Transmission Planning Process ("Proposed Decision") promulgated on January 10, 2025, Horizon West Transmission LLC ("HWT") submits these reply comments. In these comments, HWT supports the position of others that certain wind resources be included in future Integrated Resource Planning ("IRP") cycles, and also notes that such an inclusion would provide additional benefits during the Transmission Planning Process ("TPP") beyond those already noted in the opening comments.

B. COMMENTS

1. The Public Utilities Commission of the State of California ("CPUC" or "Commission") should consider including out of state ("OOS") wind resources from Oregon in future IRP cycles in order to provide optionality for the deliverability of renewable resources to Bay Area load centers.

While the Proposed Decision directs the California Independent System Operator ("CAISO") to study, but not trigger, the upgrades that would be necessary to deliver OOS wind to California, it appears that such a study may be limited to the deliverability of OOS from certain states (*e.g.*, Wyoming). Other parties have commented that the Commission should map OOS wind

in Oregon to enable a similar study for the California Oregon Intertie ("COI").[1] HWT supports the mapping of OOS wind resources to Oregon for this reason and adds that such mapping would also enable the study of optionality to previously approved CAISO projects.

In its 2023-2024 Transmission Plan, CAISO included two projects that collectively deliver 1,607 megawatts ("MW") of offshore wind ("OSW") and connect Northern California and Southern California. Specifically, CAISO included a 500 kilovolt ("kV") alternating current ("AC") line to interconnect the new Humboldt 500 kV substation to the Fern Road 500 kV substation and a new high-voltage direct current ("HVDC") line, initially operated as a 500 kV AC line, to interconnect the new Humboldt 500 kV substation to the Collinsville 500 kV substation.[2] The development of OSW is now more uncertain due to actions taken in an Executive Order ("EO") issued by the Trump Administration. As noted in comments by Terra-Gen, an EO issued by the federal government includes several mandates that "are likely to cause substantial disruption to the planning and investment cycles for new wind projects."[3] In the event that OSW does not materialize as previously envisioned, the capacity that was originally meant for OSW could be reserved by other resource types. Indeed, Terra-Gen advocates for CAISO to work with stakeholders to design policy that could do exactly that.[4]

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[1] *See, e.g.*, *Comments of NextEra Energy Resources, LLC on the Proposed Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for 2025-2026 Transmission Planning Process*, R.20-05-003, January 30, 2025, p. 2-6.

[2] *Board Approved 2023-2024 Transmission Plan*, California Independent System Operator, May 23, 2024, https://www.caiso.com/documents/iso-board-approved-2023-2024-transmission-plan.pdf, p. 3.

[3] *Comments of Terra-Gen, LLC on the Proposed Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for 2025-2026 Transmission Planning Process*, R.20-05-003, January 30, 2025, p. 4.

[4] *Id*. at 5-6.

One way for CAISO to evaluate the optionality of using capacity originally reserved for OSW for other renewable resources instead is in relation to the approved Humboldt-Fern and Humboldt-Collinsville projects. These projects are in close proximity to OOS wind development in Oregon. CAISO's inclusion of Oregon wind resources in future IRP cycles would enable CAISO to study the possibility that the Humboldt-Fern and Humboldt-Collinsville projects could be used to deliver such resources to the Bay Area load center. The mapping of OOS wind in Oregon would provide multiple benefits in future TPP cycles by enabling the studying of several possible upgrades, including to the COI and the Humboldt projects from the 2023-2024 Transmission Plan.

2. The inclusion of additional OOS wind in future IRP cycles would ameliorate the imbalance in onshore wind resources between Northern and Southern California and allow deliverability of wind resources from Idaho.

Both the Proposed Decision and CAISO's 20-Year Transmission Outlook feature 1,700 MW of OOS wind mapped to the Tesla busbar.[5] In comparison, CAISO's 20-Year Transmission Outlook includes 12,000 MW of OOS Wind mapped to Southern California (6,671 MW of OOS wind from Wyoming and Idaho, as well as 5,329 of OOS wind from New Mexico)[6] and the Proposed Decision includes 7,200 MW of OOS wind mapped to Southern California. There is a clear imbalance between the OOS wind resources that are being mapped to Northern California and those mapped to Southern California. The addition of OOS wind from Oregon in future IRP cycles would help better distribute onshore wind resources throughout the CAISO grid.

Additionally, the mapping of OOS wind from Oregon by the Commission would enable CAISO to also explore the deliverability from wind resources in Idaho. Upgrades to Path 66 for Oregon wind resources could provide further benefits to the northern grid, allowing the

[5] 2024 20-Year Transmission Outlook, California Independent System Operator, July 31, 2024, https://www.caiso.com/documents/2024-20-year-transmission-outlook-jul-31-2024.pdf, p. 24-25.

[6] *Id*. at 28-29.

deliverability of wind resources in Idaho. The existing 500 kV system in Oregon and Idaho includes approximately 450 miles of 500 kV transmission line and multiple substations from the Malin substation to the Midpoint substation. Therefore, transmission projects that allow for OOS wind from Oregon to be delivered to load centers in Northern California could also allow for the deliverability of OOS wind from Idaho.

C. CONCLUSION

HWT supports the recommendation that CPUC give serious consideration in future IRP cycles to mapping additional OOS wind in Oregon. In addition to the benefits detailed in the opening comments, this would allow CAISO to study both optionality for already approved projects and the possibility OOS wind in Idaho can also serve California's needs.

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