



**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

R.20-05-003
(Filed May 7, 2020)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) ON THE PROPOSED DECISION TRANSMITTING
ELECTRICITY RESOURCE PORTFOLIOS TO THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR FOR 2025-2026 TRANSMISSION
PLANNING PROCESS**

TYSON SMITH
BENJAMIN C. ELLIS

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (415) 265-2678
Facsimile: (510) 898-9696
E-Mail: Ben.Ellis@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 4, 2025

TABLE OF CONTENTS

	Page
I. PG&E’S REPLY COMMENTS	1
A. The Commission Should Request the 2025-2026 Busbar Mapping Be Used by the CAISO in Determining Where Resource Deliverability Will Be Reserved	1
B. The Commission Should Commit to Using Updated LSE Plans Rather than Stale 2022 Data in 2026-2027 TPP Portfolio Development	2
II. CONCLUSION.....	3

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Pursuant to Rule 14.3(d) of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) respectfully submits these comments in reply to certain stakeholders’ opening comments to the *[Proposed] Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for the 2025-2026 Transmission Planning Process* (Proposed Decision), issued on January 10, 2025.

I. PG&E’S REPLY COMMENTS

A. The Commission Should Request the 2025-2026 Busbar Mapping Be Used by the CAISO in Determining Where Resource Deliverability Will Be Reserved

In its Opening Comments, the California Independent System Operator (CAISO) supports the Proposed Decision’s request for the CAISO to reserve deliverability for long lead-time (LLT) resources.¹ However, CAISO urges the Commission to communicate specific resource information (*i.e.*, technology type, location, capacity, and expected projects) and states that “the Commission’s busbar mapping also provides sufficient resource and locational granularity for the CAISO to study and reserve TPD for specific resource types and locations.”² PG&E agrees with CAISO’s recommendation and statement. PG&E believes that the 2025-2026

¹ See *Opening Comments of the California Independent System Operator Corporation on the Proposed Decision Transmitting Electricity Resource Portfolios for 2025-2026 Transmission Planning Process* (CAISO Opening Comments), pp. 1-2 (Jan. 30, 2025).

² *Id.* at p. 1.

Busbar Mapping of the TPP Base Case Portfolio is appropriate for aiding the CAISO in the determination of where LLT resource deliverability should be reserved.

In PG&E's Opening Comments, PG&E noted that the Proposed Decision does not specify *how* the CAISO should assign reserved deliverability to specific projects.³ Meaning, the TPP busbar mapping which the CAISO and PG&E agrees is appropriate for use in reserving deliverability is not recognized in the Proposed Decision. PG&E encourages the Commission to specify that deliverability will be reserved in accordance with the 2025-2026 TPP Busbar Mapping, including the pumped storage project and associated capacity at the Gregg Substation. These requested modifications are included in PG&E's Opening Comments, Appendix A.

B. The Commission Should Commit to Using Updated LSE Plans Rather than Stale 2022 Data in 2026-2027 TPP Portfolio Development

PG&E agrees with California Community Choice Association's (CalCCA) comments that the Commission should use the updated procurement plans from load serving entities (LSE) rather than the IRP plans from LSEs filed in November 2022.⁴ CalCCA states that if the Commission follows a similar schedule in next year's TPP development, "then the Commission will need to rely again on LSEs' 2022 IRPs. The 2022 IRPs will be even more stale by this time."⁵ CalCCA proposes two potential solutions for the Commission to address as follows:

- (1) using updated individual LSE IRPs filed in November 2025 if portfolio development occurs after individual LSE IRP plans are filed in November 2025; or
- (2) if portfolio development occurs before individual LSE IRP plans are filed in November 2025, supplementing the 2022 IRPs with updated procurement information from LSEs through semi-annual compliance filings or other existing procurement status reports. If the Commission uses updated procurement information provided by LSEs through existing procurement status reporting, the Commission can ask

³ See *Opening Comments of Pacific Gas and Electric Company (U 39 E) on the Proposed Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for 2025-2026 Transmission Planning Process* (PG&E Opening Comments), pp. 2-3 (Jan. 30, 2025).

⁴ See *California Community Choice Association's Comments on the Proposed Decision Transmitting Electricity Resource Portfolios to the California Independent System Operator for 2025-2026 Transmission Planning Process* (CalCCA Opening Comments), pp. 3-4 (Jan. 30, 2025).

⁵ *Id.* at p. 4.

LSEs to validate the information to ensure all resources under contract are included.⁶

PG&E believes that both of CalCCA's recommendations are potentially workable and either are preferable to using the 2022 LSE Plans. If the 2025-2026 TPP timeline is followed, as pointed out by CalCCA, the Commission will have a chance to revise the portfolios submitted to CAISO in Q1 2026, which is after the 2025 LSE Plan submittal deadline of November 1, 2025.⁷ Although the timing may be tight, this may be the ideal approach should the 2025 LSE Plans differ significantly from previous semi-annual compliance filings. Regardless of whether the first option is feasible, CalCCA's second recommended option strikes a good middle ground and should be adopted to move the TPP portfolio development process forward more than "incrementally" while meeting the deadline to transmit portfolios to the CAISO.

II. CONCLUSION

PG&E respectfully requests that the Commission consider the recommendations presented in these reply comments. PG&E looks forward to on-going discussions in this proceeding as the state continues its progress in meeting its reliability and decarbonization goals.

Respectfully Submitted,

BENJAMIN C. ELLIS

By: /s/ Benjamin C. Ellis

BENJAMIN C. ELLIS

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (415) 265-2678
Facsimile: (510) 898-9696
E-Mail: Ben.Ellis@pge.com

Attorney for
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⁶ *Id.*

⁷ *Id.*