



**Comments of the California Energy Storage Alliance on the 2020-2021
Transmission Planning Update Call**

Submitted by	Organization	Date Submitted
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1. Wildfire Mitigation Assessment Update

CESA is fully supportive of the ISO's efforts to integrate data derived from the State's experience with public safety power shutoff (PSPS) events into the transmission planning process (TPP). This work is essential to ensure the reliability of the electric service as well as guarantee that planned projects do not exacerbate the likelihood of fires in areas identified as particularly risky.

CESA is especially supportive of the ISO's intention to develop different evaluation scenarios based on taking out a combination of different voltage facilities and/or facilities within various fire zones. CESA considers this approach to be viable in general, as it would highlight inconsistencies between the TPP and California's efforts regarding wildfire mitigation. Moreover, CESA appreciates the ISO's inclusion of several potential mitigation strategy. As noted during the June 3, 2020 call, the ISO will both identify active CAISO approved projects that could potentially reduce risk of fire impacts, and identify potential upgrades that could help reduce the risks of fire impacts. In this context, CESA believes the ISO should consider integrating the information derived from this effort into the record that has been developed for the now-paused Storage as a Transmission Asset (SATA) Initiative.

Energy storage is a resource class that could greatly contribute in the ISO's effort to mitigate wildfire risks and ensure a cost-effective and reliable transmission system. As the ISO considers measures to minimize the potential impacts of fires, CESA believes the evaluation of non-wire alternatives (NWAs) should be more deeply considered. NWAs are well-positioned to ensure the resiliency of local or radial systems, even when transmission infrastructure is unavailable due to the risks of wildfires. Furthermore, NWAs have become increasingly cost-effective due to: (1) the declining cost of battery storage technologies; and (2) the potential provision of other market products and/or services. Thus, CESA urges the ISO to create further synergies between this process and the record that has been developed in the SATA Initiative.

2. Storage mapping and resource retirement in policy assessment

CESA appreciates the ISO's work to refine the assumptions and methods related to the busbar mapping of energy storage resources. CESA is aware of the limitations of the current mapping framework proposed by the California Public Utilities Commission (CPUC). Considering the integrated resource planning (IRP) process at the CPUC expects unprecedented levels of energy storage deployment, CESA agrees that a clear and coordinated mapping framework is necessary to ensure the reliability of the electric system and support the state's environmental targets.

As noted by the ISO during the stakeholder call, the CPUC's mapping methodology based on commercial interest, project status, and location is deficient and must take into account the effects storage will have in the retirement of existing natural gas infrastructure and local area load/supply. CESA supports the ISO's decision to include these elements in the refinement of the busbar mapping methodology.

While supportive, CESA offers other considerations the ISO might find valuable to further improve this mapping exercise. As done in special studies in previous TPP cycles, the ISO should consider the siting of energy storage within disadvantaged communities (DACs) and within local areas and/or sub-areas with the most significant levels of local emissions (*i.e.*, Version 3.0 of the CalEnviroScreen) to support the identification of specific gas facilities to prioritize for mapping storage replacement. Ideally, this mapping methodology would be provided by the CPUC's IRP process, but for the time being, this may be a prudent interim approach.

Similarly, CESA urges the ISO to consider the hybridization of retained natural gas assets with energy storage resources. As noted in the stakeholder call, the ISO will choose to retain a fraction of natural gas capacity if it cannot be fully replaced by energy storage due to charging limits. In conducting this mapping exercise, even if there is insufficient storage to fully replace and retire the local capacity provided by the energy storage resources, mapping in accordance with these needs would still identify how storage could potentially reduce the capacity factor of gas facilities, which contribute to reduced GHG emissions. This outcome also does not preclude the potential future hybridization of natural gas capacity – a material modification that is easily performed and can substantially improve the operational characteristics of fossil-fueled assets.

Overall, CESA supports the ISO's approach and offers these additional recommendations for the ISO's consideration. By focusing on the impacts energy storage could have on DACs and areas with high levels of local pollution, the ISO would be better equipped to identify transmission solutions that can incent the development of renewable and storage assets in areas that have been historically underserved and dependent on fossil generation.

3. 2030 Long-Term Local Capacity Technical Study

CESA is fully supportive of the ISO's intention to further evaluate the role energy storage assets will play in the future of California's electric power system through its 2030 Long-Term Local Capacity Technical Study. CESA believes the ISO's efforts will enable developers, buyers, and regulators to better understand the long-term storage needs of

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the State, as well as the particular characteristics that are better positioned to attend them. In particular, CESA is supportive of the ISO's decision to consider the deployment of conventional transmission assets or preferred resources to enable the retirement of natural gas resources.