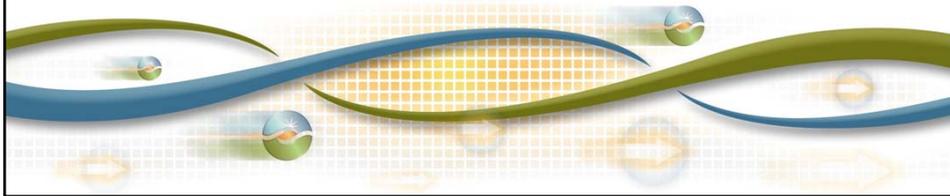


The Paradigm Shift in the Role of the Transmission Network

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Outline of the presentation

- What is the paradigm shift?
- Valuing the benefits of transmission expansion
 - The traditional vertically-integrated utility paradigm
 - Competitive wholesale power markets with open access transmission service
- Impacts of new public policies on transmission needs and transmission planning
 - Access to renewable generation
 - Policy-driven transmission planning under uncertainty about future needs
 - Competitive opportunities to build rate-based transmission
- California ISO initiatives and perspectives

What is the paradigm shift?

1. From traditional, vertically-integrated, regulated monopoly utilities, to competitive wholesale energy markets and open-access transmission service operated by ISOs and RTOs (“electric restructuring”)
2. From gradual, incremental transmission expansion to meet load growth and occasional new generation, to a massive turnover of the supply fleet in response to environmental policy directives
3. From expansion based on traditional reliability and economic-benefits criteria, to a new public-policy-driven basis for approving transmission additions, with uncertainty about future needs
4. From all transmission being built by incumbent utilities to new opportunities for independent developers

Major federal reforms affecting transmission planning and investment

1996	Order 888	- transmission open access - encouraged but did not require transmission planning
1999	Order 2000	- established regional scope, planning and inter-regional coordination functions of RTOs, but RTO formation remained voluntary
2003	Order 2003	- standardized generation interconnection processes
2006	Order 679	- rate incentives for transmission investment
2007	Order 890	- required transmission providers (such as CAISO) to have coordinated, open, and transparent regional transmission planning process
2011	Order 1000	- builds on Order 890 to include: processes for identifying policy-driven transmission needs; procedures to include non-incumbent transmission owners; inter-regional coordination and cost allocation

Principal potential benefits of a proposed transmission addition or upgrade

- Increased system reliability
- Improvements in system operation, capacity utilization
- Lower costs of energy and operating reserves
- Lower costs of generation capacity to meet peak load (particularly with non-coincident peak loads)
- Lower environmental emissions (unless expansion increases utilization of more polluting generation) and better spatial dispersion of emissions
- Possible improvements in system losses
- NEW – Accommodation of major shifts in the supply fleet driven by public policy objectives (e.g., 33% RPS)

Valuing transmission in the Vertical Integrated (VI) Utility Paradigm

- To meet demand growth in an area with no reduction in reliability (regulatory mandate), the utility can either construct local generation or expand transmission
 - Utility's retail price of electricity is regulated, so it maximizes profits by pursuing the least-cost solution
- Example of utility benefit calculation for transmission expansion
 - Local generation costs \$50/MWh, and imported energy \$20/MWh
 - => transmission upgrade of 10 MW of capacity yields benefit of \$300/hr = $[(\$50/\text{MWh} - \$20/\text{MWh}) * 10 \text{ MWh}]$ each hour
 - An economic benefit of transmission is the generation cost savings from increased ability to exploit locational cost differences
- Alternatively, utility may maximize profits by installing new high-cost local generation that operates only in high-demand hours
 - Combustion turbine costing \$150/MWh but needed only for a small number of hours may be more cost effective than transmission upgrade

Transmission versus generation risk considerations

- Transmission upgrade with low-cost distant generation entails significant regulatory risk
 - Longer time horizon to construct new transmission
 - Can require large amount of distant generation to realize efficient utilization of new transmission line
 - Challenge to obtain regulatory siting and environmental permits
 - Commitments of previous regulator must be honored by current and future regulators
- Relying on local generation maintains permanent “load pockets” – regions with insufficient transmission capacity to meet all demand with imported energy
 - San Francisco Bay Area, San Diego Area
 - May be strong local opposition to building new generation

Paradigm Shift to Wholesale Markets

- Elements of the new market paradigm
 - Generation sector is subject to competition
 - Transmission service is subject to non-discriminatory (open access) requirements, mainly under ISOs/RTOs
 - VI utility retains distribution system, and may or may not face competition to serve retail customers in its territory
 - Transmission planning and new generation interconnection are under the transmission system operator
- Wholesale markets are the vehicle for generation competition and non-discriminatory transmission service
 - Market structure includes day-ahead and real-time (intra-day) energy and reserve services
 - May include forward locational capacity to ensure adequacy under peak-load conditions
 - System is optimized based on participants bids and offers, rather than on actual costs that were available to the VI utility

Implications of the shift to markets for transmission planning

- Economic value of transmission expansion is increased ability to exploit locational *price* differences
 - Prices may differ from costs due to any factors that reduce the competitiveness of supply resources
 - E.g., local market power may exist in load pockets, where load exceeds the capability of transmission to import energy from cheaper external resources
 - Such constraints may exist in the wholesale market paradigm because they were optimal under the prior VI utility paradigm
- A new potential benefit of a transmission upgrade is to limit the exercise of local market power by increasing competition, thus reducing the cost of energy, reserves and resource adequacy capacity

Another aspect of the shift to markets – new transmission ownership and operating structures

- **Transco:** Consolidated ownership and operation of all divested transmission assets in a region or subregion, subject to regulated rate of return (e.g., for-profit ISO)
- **Transmission-owning utility or independent transmission company:** Ownership of some or all transmission in a subregion, subject to regulated rate of return, under independent operator such as ISO
- **Merchant transmission owner:** Owner of individual transmission assets, subject to market-based revenue and regulation, under the independent operator
- *Note: All structures are consistent with open access requirements whether under ISO or RTO or not*

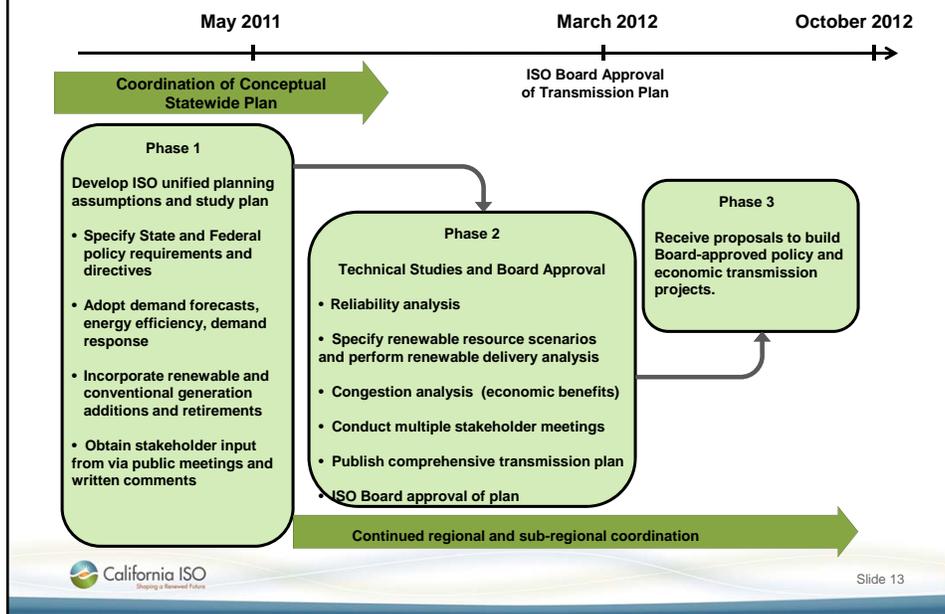
The shift to public policy-driven transmission planning under uncertainty

- Environmental policy mandates – such as 33% RPS by 2020 – require massive changes to the supply fleet
 - Numerous resource rich areas (wind, solar radiation) beyond the reach of existing transmission and far from load centers
 - Needed transmission does not qualify under traditional reliability or economic-benefit criteria
 - Dozens of GW of generation project proposals far exceed needed capacity, creating uncertainty about actual geographic pattern of future generation development
 - Transmission development takes much longer than generation development, so transmission decisions cannot wait for certainty
- Competing objectives for transmission planners
 - Enable sufficient transmission to be built and energized in time to meet 33% RPS by 2020 policy mandate, but ...
 - Minimize risk to ratepayers of funding under-utilized transmission

The strategy for transmission planning under the new paradigm

- Create new “public policy-driven” transmission category
- Adopt the given policy mandate as a planning objective
 - Final transmission plan and expected resource fleet must allow 33% of MWh consumed on an annual basis to come from renewable resources (8760-hour production simulation)
- Specify several alternative scenarios of potential renewable resource development, and identify transmission for each
 - Identifying preferred resource areas requires collaboration between ISO and state authorities that oversee resource procurement by load-serving entities and environmental generation permitting
- Approve transmission facilities found needed under multiple scenarios to minimize risk of under-utilized transmission
 - Defer approval of other facilities pending new information in next planning cycle

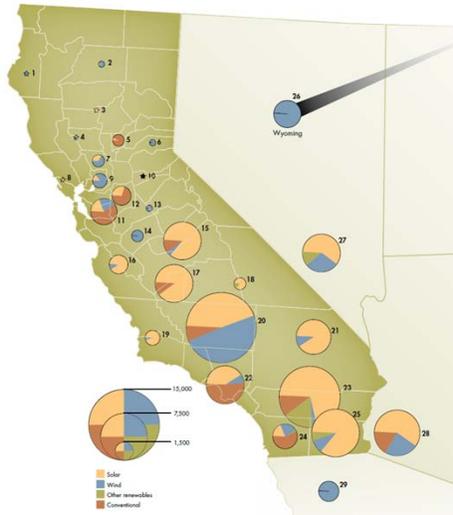
CAISO's 2011/2012 Transmission Plan Cycle



A key challenge – how to specify the set of feasible generation development scenarios

- California's Renewable Energy Transmission Initiative (RETI) identified and analyzed all Competitive Renewable Energy Zones (CREZes)
- RETI results and other regulatory assessments were used in state-wide (CTPG) and CAISO planning processes
 - (CTPG = California Transmission Planning Group)
- Evidence of commercial interest in each CREZ the CTPG considered:
 - Renewable resources in the CPUC's "discounted core" and in portfolios of publicly owned utilities (POUs)
 - The positions of the same resources in the generator interconnection queues of the ISO and the POU's
 - Environmental scores and "discounted core" information was developed within the CPUC's 2010 Long Term Procurement Planning process
- End result: Potentially viable CREZes still too numerous to provide enough certainty to transmission planning decisions

Interconnection queue far exceeds policy needs



Interconnection queue by county

County	Number of Projects	Renewables MW	Conventional MW	Total MW
1 Humboldt	1	50		50
2 Shasta	2	165		165
3 Butte, Glenn, Tehama	5	122		122
4 Inyo, Colusa	1	66		66
5 Sutter, Yuba	2	20	600	600
6 Placer	1	220		220
7 Yolo	5	587		587
8 Marin, Sonoma	3	92		10
9 Solano	11	908		908
10 Amador	1	18		18
11 Alameda, Contra Costa, Santa Clara	16	1,110	1,698	2,808
12 San Joaquin	11	325	1,020	1,345
13 Stanislaus, Tuolumne	5	202		202
14 Merced	7	612		612
15 Fresno, Madera	79	4,474	594	5,067
16 Monterey, San Benito	4	1,530		1,530
17 Kings	38	4,614	625	5,239
18 Inyo, Tulare	13	625		625
19 San Luis Obispo, Santa Barbara	6	896		896
20 Kern	109	13,802	1,100	14,902
21 San Bernardino	21	4,395		4,395
22 Los Angeles, Orange	50	2,390	2,650	5,040
23 Riverside	34	10,667	1,420	12,087
24 San Diego	29	1,094	1,453	2,545
25 Imperial	27	7,683		7,683
In-state Totals	481	56,787	11,159	67,947
26 Wyoming	1	3,000		3,000
27 Nevada	18	5,252		5,252
28 Arizona, New Mexico	10	5,878	1,250	7,128
29 Mexico	3	1,628		1,628
Out-of-state Totals	32	15,758	1,250	17,008
TOTAL ALL PROJECTS	513	72,545	12,409	84,955



Transmission underway to meet 33% RPS in 2020



Total cost =
\$7.2 billion

Transmission upgrade	Approval status		Renewable Potential		Online
	ISO	CPUC	MW	TWh/Yr	
1 Carrizo-Midway	Pending LGIA	Not yet filed	900	2.1	2012
2 Sunrise Powerlink	Approved	Approved	1,700	4.1	2012
3 Eldorado-Ivanpah	LGIA	Approved	1,400	3.6	2013
4 Pisgah-Lugo	LGIA	Not yet filed**	1,750	4.1	2017
5 Valley-Colorado River	Approved	Approved*	4,700	8.6	2013
6 West of Devers	LGIA	Not yet filed			2017
7 Tehachapi	Approved	Approved	4,500	15.2	2015
8 Tehachapi Wind/Solar Diversity	N/A	N/A	1,000	3.0	2015
9 Cool Water-Lugo	Pending LGIA	Not yet filed	600	1.4	2018
10 South Contra Costa	LGIA	Not yet filed	300	0.8	2015
11 Borden-Gregg	LGIA	Not yet filed	800	2.0	2015
12 Path 42	Pending approval	Not yet filed	1,400	3.5	2015
Other-Outside of ISO Grid	N/A	N/A	3,300	8.4	
Total				56.8	
TWh/year needed in ISO area to meet 33% goal:				44	

* Petition to modify CPUC pending. ** Large Generator Interconnection Agreement



33% RPS scenarios for 2020 cover a reasonable range renewable and load conditions

Case	Case Title	Description
1	33% Trajectory	Based on contracted activity
2	Environmental Constrained	High distributed solar
3	Cost Constrained	Low cost (wind, out of state)
4	Time Constrained	Fast development (out-of-state)
5	20% Trajectory	For comparison
6	33% Trajectory High Load	Higher load growth and/or energy program under-performance
7	33% Trajectory Low Load	Lower load growth and/or energy program over-performance

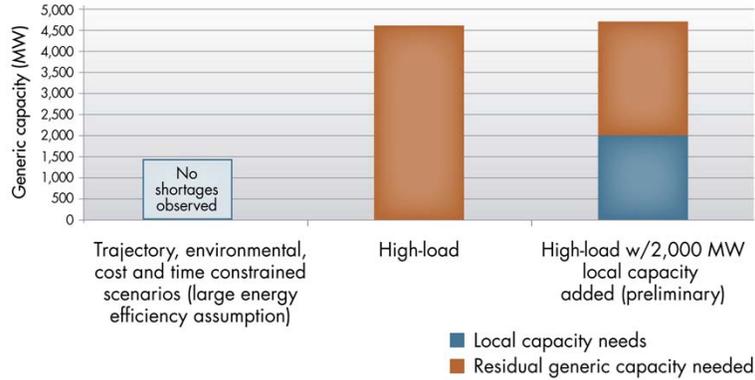
Fossil Plant Retirement – Once-Through-Cooling



Unit	Capacity (MW)	Area
Harbor	237.5	LDWP
Haynes 1-6	1570	LDWP
Scattergood 1-3	803	LDWP
Contra Costa 6-7	674	PG&E_BAY
Pittsburg 5-6	629	PG&E_BAY
Potrero	206	PG&E_BAY
Humboldt Bay 1-2	135	PG&E_VLY
Morro Bay 3-4	650	PG&E_VLY
Moss Landing 6-7	1510.03	PG&E_VLY
Alamitos 1-6	2010.38	SCE
El Segundo 3-4	670	SCE
Huntington Beach 1-4	901.55	SCE
Mandalay 1-2	430.29	SCE
Ormond Beach 1-2	1516.27	SCE
Redondo Beach 5-8	1343.01	SCE
Encina 1-5	946	SDG&E
South Bay 1-4	693	SDG&E

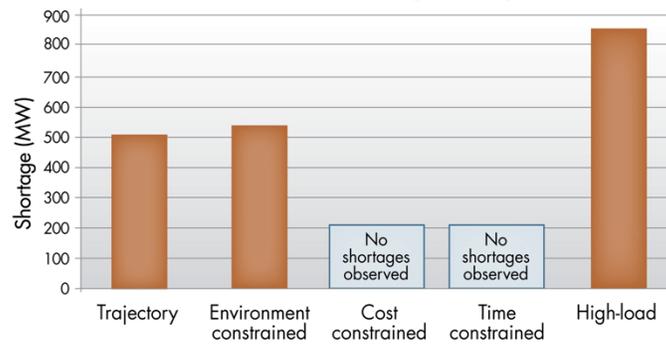
Potential need for 4,600 MW of upward flexible resources observed in the high-load scenario

Upward balancing flexibility shortage/needs



Out of approximately 3,500 MW downward balancing requirements, observed some hours of shortages

Downward balancing shortage



Note: Downward balancing may be more effectively and efficiently managed using curtailment or storage rather than less economic dispatch of flexible resources to higher level to maintain downward flexibility

CAISO transmission planning initiatives, challenges and perspectives

- More comprehensive transmission planning process that considers reliability needs, economic benefits, renewable integration, distributed energy resources, once-through-cooling policy, air emissions policy
- Better integrate generation interconnection with transmission planning
 - Rely more on transmission planning to drive significant upgrades
 - Use policy-driven category to meet interconnection needs for preferred resource development areas
 - Assign cost for additional upgrades to generation developers
- Improve process for specifying resource portfolios used for planning
 - Incorporate findings of state environmental analysis
- Manage interconnection queue to eliminate inactive or excessively delayed projects, reducing upgrade needs for projects later in queue

... continued

- Ensure availability of flexible capacity needed for reliable operation with larger amounts of variable renewables
 - Incorporate “integration resources” in resource scenarios so that transmission planning can account for operational needs
- Accelerate market design initiatives to procure, compensate and help support sustained commercial viability of needed flexible resources
 - Expand opportunities for generation alternatives – such as demand response and storage – to participate in CAISO markets, with the goal of meaningful levels of deployment before 2020
- Refine local capacity studies for 2020 to inform procurement decisions in the 2011-2012 CPUC procurement cycle
 - Target procurement of capacity with needed flexibility and ramping capability, including new investment
- Inter-regional (i.e., west-wide) coordination in transmission planning – required by FERC Order 1000; compliance due in 18 months