

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



**FILED**

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Order Instituting Rulemaking to Develop an  
Electricity Integrated Resource Planning  
Framework and to Coordinate and Refine  
Long-Term Procurement Planning  
Requirements

Rulemaking 16-02-007  
(Filed February 11, 2016)

**COMMENTS OF NATIONAL GRID USA ON PROPOSED  
DECISION ON 2017-2018 INTEGRATED RESOURCE PLAN**

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National Grid USA (“National Grid”) submits the following opening comments on the Proposed *Decision Adopting Preferred Reference System Plan and Portfolio for 2017-2018 Integrated Resource Plan Cycle* (“Proposed Decision”). As described in prior comments filed in this proceeding, National Grid, in partnership with Rye Development, is actively developing two of the most-promising, closed-loop pumped storage projects in the United States, the 400 MW Swan Lake project and the 1,200 MW Goldendale project, both of which are strategically located at points near the interties between the Pacific Northwest and California.

National Grid commends Commission staff for its considerable efforts in developing the Reference System Plan and the Administrative Law Judge and for carefully addressing the multitude of issues raised in the Proposed Decision. In particular, and consistent with its prior comments in this proceeding, National Grid strongly supports the Proposed Decision’s directive to open a separate “procurement track” to consider issues related to procurement of large, long-lead time resources, including pumped storage hydro, by summer 2019.<sup>1</sup> As the Proposed Decision concludes, “the appropriate way to make more progress, beyond just utilizing more

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<sup>1</sup> Proposed Decision, at 135.

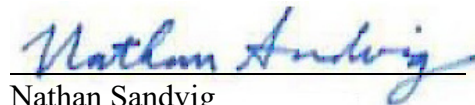
appropriate planning assumptions, is to begin to conduct procurement processes for various types of resources.”<sup>2</sup>

The Proposed Decision correctly identifies many of the issues and questions that should be considered in the procurement track. While addressing these issues is important, the Commission should be careful to control the scope and not include issues that are tangentially related but not critical path items to procurement of such resources. Doing so will enable the Commission to adopt a procurement decision and bring resources on line in a timely manner. Ideally, the Commission could issue an interim decision authorizing multi-party procurement of some amount of no-regrets long duration storage even while it is considering and resolving remaining outstanding procurement track issues.

For the foregoing reasons National Grid supports adoption of the Proposed Decision and encourages the Commission to open the “procurement track” of the IRP proceeding without delay.

Dated this 8th day of April, 2019.

Respectfully submitted,



Nathan Sandvig  
Director, Business Development  
National Grid USA

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<sup>2</sup> Id, at 136.