



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

1155 Market St., 11th Floor, San Francisco, CA 94103 • Tel. (415) 554-3155 • Fax (415) 554-3161 • TTY (415) 554.3488



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ED HARRINGTON
GENERAL MANAGER

Regional Transmission Planning
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
Via e-mail: regionaltransmission@caiso.com

Additional Comments of the San Francisco Public Utilities Commission California ISO's Draft 2010 Transmission Plan

The SFPUC appreciates the ISO finally releasing the reliability results for San Francisco. Although providing only three days for comments is insufficient time for a full review, the SFPUC offers the following initial comments.

The reliability studies essentially reconfirm and provide additional detail for the ISO's previously stated conclusion that all of the generating units at the Potrero power plant are not needed for reliability and therefore can be closed once the Trans Bay Cable (TBC) becomes operational and PG&E completes the recabling of its underground transmission lines between Martin, Bayshore, and Potrero substations. This result is also consistent with the ISO's just released draft 2011 Local Capacity Requirements (LCR) Study which also concludes that there is no need for generation within San Francisco. These are both conclusions that the SFPUC strongly supports. The SFPUC appreciates both the analytical work done by the ISO, as well as the ISO's willingness to work closely with the City and County of San Francisco (CCSF) to thoroughly consider this issue.

As noted in our initial comments to the Draft 2010 Transmission Plan, the SFPUC remains concerned over the reliability of the 230 kV system that serves downtown San Francisco. Much of the analysis contained in the San Francisco reliability study appears to focus on how an interconnection between the 230 kV and 115 kV system would affect the reliability of the 115 kV system, while taking as a given that the loss of both 230 kV lines serving downtown would result in 95% of load being dropped in the downtown area. As noted in our previous comments:

While this result may be consistent with the ISO's planning criteria, we are highly concerned about the public safety and economic consequences should such an event occur given the high density and critical regional importance of San Francisco's downtown area. While PG&E's proposed Embarcadero-Potrero project may not be the best approach to address this concern, the SFPUC encourages the ISO to continue to study this issue with the goal of identifying economical solutions to improve reliability.

Although the study concludes that San Francisco should have reliable electric service, Table 7.7¹ shows some Category C outages in 2014 and 2019. In reference to Table 7.7 the ISO states that:

Among more than 100 Category C outages evaluated, these are the most severe L-1-1 contingencies causing overloads. Most of the transmission facilities including transformers are severely overloaded and can be mitigated through transferring loads to other substations and **some load dropping**. ISO staff is working with PG&E staff to finalize mitigation plans before the summer of 2010. (emphasis added)

Our own technical studies, conducted by Flynn-RCI, indicate that the Category C overloads found under the ISO studies, especially those on the 115kV cables, can be mitigated by certain operating procedures. These procedures may include opening and/or closing the bus tie breaker(s) at Larkin and reducing (running back) the Transbay Cable flows, etc. In other words, there are mitigation measures for most of these Category C overloads that do not involve any load dropping. As currently written, the report appears to significantly overstate the actual likelihood of load dropping and should be revised and clarified.

Finally, as an interested stakeholder, we would appreciate to be informed concerning the ISO's efforts to finalize the mitigation plans with PG&E.

Sincerely,

/s/ James Hendry
JAMES HENDRY
Regulatory Affairs

cc: Barbara Hale, SFPUC
Manuel Ramirez, SFPUC
Theresa Mueller, City Attorney
Barry Flynn, Flynn-RCI
Deirdre Appel, SFPUC
Irene Moosen, Esq.

¹ Section 7.3.3, p. 300