

Comments on the Draft 2010 California ISO Transmission Plan

Introduction

PG&E appreciates the opportunity to provide comments in response to the Draft 2010 California ISO Transmission Plan and information presented during the stakeholder meeting on February 16, 2010. PG&E recognizes the substantial efforts and commends the CAISO Staff for its diligent work in performing the studies associated with the 2010 plan and the review of the projects submitted in to the 2009 Request Window. Below are comments that address the transmission system studies performed as part of the CAISO's Transmission Planning Process.

Comments

PG&E would like to highlight that the methodology used by the CAISO for the analysis of Category C3 contingencies is conservative and as such the results obtained may not appropriately reflect actual PG&E system performance. As a result, PG&E believes that the results obtained while using the current methodology should not be the sole basis for the determination of reliability issues as being reported in the PG&E Service Area Reliability Assessment section of the Draft 2010 CAISO Transmission Plan.

Table 1 in the NERC TPL Standards defines Category C3 events as:

“SLG or 3-phase fault, with Normal Clearing, Manual System Adjustment, followed by another SLG or 3-phase Fault, with Normal Clearing:

3. Category B (B1, B2, B3 or B4) contingency, manual system adjustments, followed by another Category B (B1, B2, B3 or B4) contingency.”

As stated in the above definition, when these events are being studied, the system must be adjusted following the first Category B contingency and prior to the second contingency. PG&E believes that, in an effort to simplify the analysis for these multi-step contingencies, the CAISO staff may not be performing a system adjustment in between the two contingencies being analyzed. Consequently, the results reported may be more severe than in actuality. PG&E believes that the methodology currently being used can be an effective method to flag contingencies for further review. Nevertheless, once these contingencies have been identified the manual adjustment in between the contingencies should be simulated correctly to reflect what methods the CAISO would take in

preparation for the next contingency. In this manner a more accurate analysis of system performance for these contingencies is obtained.

Conclusion

PG&E looks forward to working with the CAISO staff on the methodology for studying Category C3 events and to continue working in identifying the appropriate system adjustments for the identified issues. PG&E believes this is essential in order for both parties to be in full agreement on future studies and results. For follow-up or questions, please contact Marco Rios (415-973-8460)