



## **DRA**

*Division of Ratepayer Advocates  
California Public Utilities Commission*

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**VIA E-MAIL: [regionaltransmission@CAISO.com](mailto:regionaltransmission@CAISO.com)**

California Independent System Operator  
February 2010  
P.O. Box 639014  
Folsom, CA 95763-901

Attention: 2010 California Independent System Operator Transmission Plan Draft

**Subject: COMMENTS OF THE DIVISION OF RATEPAYER  
ADVOCATES OF THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION ON CAISO'S 2010 CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR TRANSMISSION  
PLAN DRAFT DATED FEBRUARY, 2010**

### **I. INTRODUCTION**

The Division of Ratepayer Advocates (“DRA”) of the California Public Utilities Commission (“CPUC”) appreciates the opportunity to comment on the 2010 California Independent System Operator (“CAISO”) Transmission Plan Draft (“Plan”), issued on February 9, 2010, and discussed in a stakeholder teleconference on February 16, 2010. DRA has a statutory responsibility to advocate for the ratepayers of the State of California to achieve the lowest possible rates for service, consistent with reliable and safe service levels.

The Plan is the result of CAISO’s required effort to assess the reliability of the transmission network under its control, that is, the CAISO controlled-grid, on an annual basis. CAISO’s goal is to maintain compliance with applicable grid reliability criteria and to ensure safe, reliable and sufficient electric service on the CAISO controlled grid. The Plan is a massive undertaking, with the draft product numbering 270 pages. The document’s very purpose makes a thorough

stakeholder review process imperative. DRA has a large number of detailed comments to present for consideration; however, there are four general areas that need to be addressed immediately.

CAISO staff intends to submit the Plan to the CAISO Board of Governors for approval on March 25, 2010. As a result, CAISO staff has shortened the original review cycle of one month to a much shorter period. DRA believes that this compressed schedule will result in an inadequate review by stakeholders, thus resulting in a less than optimal product. The Plan shows a dramatic increase in approved reliability projects over the 2009 Plan and further investigation is needed to clarify this major change. Further, no economic projects were considered by CAISO in the Plan, although a number of economic projects have been submitted to CAISO in the previous request windows. Additionally, no renewable projects were listed in the Plan. It is possible that some of the “reliability” projects are really renewable projects. However, CAISO was non-responsive to a number of stakeholder questions in the stakeholder teleconference. These issues must be addressed and resolved for the stakeholder process to be effective. Therefore, DRA strongly urges CAISO staff to reset the schedule to allow sufficient time for reasoned stakeholder comments and appropriate resolution by CAISO.

## **II. DISCUSSION**

### **A. Return to the Original Schedule, One Month Review Cycle**

The review schedule for the 2010 California ISO Transmission Plan was compressed by CAISO staff in the February 16, 2010 Stakeholder Teleconference. Therefore, the stakeholder process has been curtailed due to a lack of adequate review time. The single identified reason for this schedule compression appears to be CAISO staff’s desire to present the 2010 plan for approval at the CAISO Board

of Governors meeting tentatively schedule for March 25, 2010. DRA recommends the comment period on this plan be extended to March 16, 2010.

**B. Determine if Reliability Projects are Categorized Correctly and Modify as Necessary**

The number of “Reliability Projects” in the 2010 Plan increased dramatically over the number contained in the 2009 Plan. However, the cause for this dramatic increase since the last study has not been provided. DRA suspects that a large number these new overloads are due to the addition of renewables and/or the removal of existing fossil fuel plants in accordance with the California Transmission Planning Group’s (“CTPG”) criteria. The projects associated with these kinds of overloads should be re-categorized as Renewable Projects. An example of this type of project is the East Kern Wind Resource Area 66kV Reconfiguration at an estimated cost of \$13 million. The CAISO should provide better explanations or criteria for their project selection and categorization.

**C. Add 2008 and 2009 Request Window Economic Projects to the Plan**

None of the eleven 2008 Request Window “economic projects” that were moved forward to the 2009 Plan and re-categorized as “Studies” were included in the 2010 Plan, nor were any 2009 Request Window “economic projects” (number unknown at present) included in those projects approved by CAISO staff. CAISO should provide an explanation for this position.

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**D. Respond to Stakeholder Questions in the Stakeholder  
Teleconference**

CAISO staff was non-responsive to serious questions raised by stakeholders in the February 16, 2010 stakeholders teleconference on the 2010 Plan, thus thwarting the purpose of the meeting and the purpose of the stakeholder process. An effective stakeholder process requires robust interaction and a thorough discussion of issues.

Sincerely,

/s/ JOSEPH ABHULIMEN

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