

Stakeholder Comments Template

2012-13 Transmission Planning Process

Reliability Assessment Preliminary Results

Submitted by	Company	Date Submitted
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BrightSource Energy, Inc. (BSE) appreciates the opportunity to provide comments on the topics discussed at the September 27-28 stakeholder meeting concerning the 2012-13 Transmission Planning Process' (TPP) Reliability Assessment Preliminary Results.

1) Comments on Valley Electric Association (VEA) assessment results:

- During the stakeholder meeting, the CAISO presented study results for VEA's system because VEA is expected to become a Participating Transmission Owner (Participating TO) in early 2013. The study results identified several potential reliability issues, as well as potential solutions, on both the VEA and Southern California Edison Company (SCE) transmission systems. BSE would like additional information about how the VEA projects will be integrated into the TPP, since VEA is not yet a Participating TO. It is unclear whether the study results produced by the ISO are for information only and/or if the ISO anticipates that VEA and SCE will submit the projects during the Request Window. Moreover, BSE would like to understand the proposed timing of these upgrades and receive confirmation that the upgrades will not delay the integration of VEA into the CAISO's system. BSE requests the CAISO provide additional clarification concerning these questions, as well as next steps in the process.
- The study results for both the VEA and SCE East of Pisgah areas recommended the modifications of SPS around Ivanpah and Crazy Eye Tap or curtailment of generation in the area as the solutions for potential problems triggered by outages in the VEA and SCE systems. While this approach is one of the possible solutions to mitigate the potential problems, however, because the majority or all of generators that may be curtailed are part of the renewable portfolio from the CPUC to meet the 33% RPS Goal, their curtailment can impact the ability to meet this RPS Goal. Therefore, BSE encourages the CAISO to explore other alternatives with less impact on the ability to meet the 33% RPS Goal. For example, if the main concerns are low voltages and large voltage deviations,

adding reactive power sources, or utilizing the reactive power capabilities of the renewable generators in the area, or developing operating procedures to reconfigure the surrounding network connections may be viable solutions.

2) SDG&E New Imperial Valley – IID Flow Control Device:

- For this upgrade, BSE encourages the CAISO and SDG&E to work with IID to ensure that the implementation of the Flow Control Device will not adversely impact power flow on other known system limitations. For example, it is unclear at this point what will be the impact from implementation this Flow Control Device on other transmission corridor such as West of Devers. In order to maintain Deliverability of generators that are located on other corridor(s), BSE encourages the CAISO and SDG&E to evaluate this potential impact prior to the approval of this project.

3) “Congestion management” as a potential solution

- To effectively evaluate the various alternative solutions to potential transmission problems, the cost and impacts of each alternative need to be identified and, if possible, quantified. Therefore, to evaluate the viability of “congestion management” as a solution, more information on the general location(s), duration(s) and amounts of generation to be curtailed or be designated as “must run”, and the system conditions under which this “congestion management” is implemented, will be needed. This information does not have to be elaborate. For example, descriptions of the conditions under which “congestion management” would be imposed can provide insight for the evaluation. Whether “congestion management” is in the form of generation curtailment or generation being placed on line, there is a difference in impacts if this “congestion management” is required only after a contingency has occurred, or if it is required before a contingency (i.e., in anticipation of the contingency). The former may only take place for a few hours during a year, while the latter could take place a few hours every weekday in summer. BSE therefore encourages the ISO to provide more specific information when “congestion management” is proposed as a solution so that its impacts can be fully understood and that it can be compared against other potential solutions.

Again, we appreciate the opportunity to comment.