

CCSF Comments on CAISO 2012-13 Transmission Plan

The City and County of San Francisco (CCSF) appreciates the opportunity to comment during the development of the CAISO 2012-13 Transmission Plan. The comments and questions below address the studies posted on the CAISO's website on August 15, 2012 and discussed during the September 26th-27th Stakeholder meetings.

There were two PTO Request Window (R/W) presentations made during the CAISO's September 27th stakeholder meeting that could potentially improve the reliability of electric service to the City.

- **PG&E Project:** The construction of another major transmission line to San Francisco, this one a 230 kV AC cable from Moraga to Potrero Substation, estimated to cost **\$450-\$550M**.

PG&E's proposal indicates that "The loss of AC transmission imports to San Francisco will result in inoperability of the DC Trans Bay Cable (TBC) and therefore result in the loss of all San Francisco demand." PG&E's assessment does not indicate which event/s could lead to "the loss of AC transmission imports to San Francisco."

- **Trans Bay Cable (TBC) Project:** TBC's transmission project includes three options for energizing the SF end of the cable to allow returning the cable to service in the event of a full SF blackout, estimated to cost **\$20M- \$30M**.

The problem statement of the TBC project indicates that the contingency of concern is "Loss of Martin substation – Loss of Service to San Francisco, including Potrero 115 kV Bus."

CCSF encourages the CAISO to thoroughly investigate the above-mentioned projects and other methods to protect the City electric supply under extreme events like the ones cited above that exceed the standard contingency analysis conducted by the CAISO. Such analysis should be shared with interested stakeholders such as the City.

In addition, we have some specific questions on the above-mentioned two R/W projects.

1. How much of the added reliability envisioned by the PG&E proposal is accomplished by the TBC proposal?
2. What are the results of the comparison to the other alternatives that PG&E has studied, such as the East Shore to Potrero 230kV line and the Newark to Potrero 230kV line?
3. PG&E's proposed Moraga-Potrero 230kV project would provide similar benefits as the SFPUC Transmission Project that CCSF submitted to the CAISO in the 2009 Request Window and that the CAISO rejected. Both projects would improve reliability to San Francisco by establishing a transmission connection to the East Bay and minimize San Francisco's reliance on the Peninsula transmission lines and the

Martin substation. The CAISO did not identify sufficient reliability benefits at that time to approve the SFPUC project. It is not clear what changes to the system have transpired since that time to now find that such a project is needed. If the CAISO finds that such a project is needed it should include in any evaluation the SFPUC's Transmission Project as an alternative to PG&E's proposal.

Other Issues

The CAISO reliability assessment discovered a Category C overload on the Potrero-Larkin 115kV cable, but no solution was proposed by the PTOs in their R/W applications. This issue was also identified in the CAISO 2011-2012 assessment. The CAISO should thoroughly investigate solutions to this problem and report back on such investigations.

The CAISO assessment has also identified a TBC run-back scheme as a solution for several potential overloads and lists expansion of those run-back schemes as a mitigation for some other contingencies. The City requests more detailed information on the existing and future expansion of the TBC run-back schemes.

CCSF appreciates the opportunity to comment on the CAISO 2012-13 Transmission Plan and acknowledges the significant effort of the CAISO staff to develop the plan so far.

If you have any questions concerning these comments, please contact Barry Flynn (888-634-7516 and brflynn@flynnrci.com) or Meg Meal (MMeal@sfgwater.org).