

**California Department of Water Resources State Water Project's Comments
to California Independent System Operator for the
2015-2016 Transmission Planning Process Stakeholder Meeting
September 21-22, 2015**

The California Department of Water Resources-State Water Project (CDWR) appreciates the opportunity to provide these comments to the 2015-2016 Transmission Planning Process (TPP) Stakeholder Meeting held by California Independent System Operator (CAISO) on September 21 and 22, 2015 to discuss the TPP preliminary reliability results posted on August 31, 2015.

CDWR also appreciates the comprehensive nature of the presentations at the Stakeholder Meeting, and believes that the meeting provided an important opportunity for Stakeholders to share various and common interests. Below are a few suggestions and requests for clarification concerning the TPP preliminary reliability results and some of the issues that were discussed at the Stakeholder Meeting:

1. During the presentation, the CAISO provided an updated to the Stakeholders that they are planning to perform a special study to assess the potential impacts of pending legislation that would increase the Renewable Portfolio Standard (RPS) to 50% by 2030 in the ongoing 2015-2016 TPP study cycle.
 - CDWR supports CAISO's efforts in planning ahead to further understand the potential impacts of a 50% renewable portfolio on the transmission elements. CDWR would like to seek further verification if the CAISO is planning to integrate the results and findings from the previous study of over-generation scenarios within the CAISO Balancing Authority with this study. Additionally, CDWR would like to have an access to the study material and base case that will be used for this study.
2. The CAISO, along with the Participating Transmission Owners (PTO) are planning to perform another study to analyze the high voltage circuit breakers that do not have adequate interrupting capability in their Balancing Authority.
 - CDWR would like to further verify if the PTO's and the CAISO are planning to perform similar analysis on behalf of their interconnected customers' circuit breakers.
3. CAISO identified the overloaded Metcalf 500/230kV transformers, peaked at 118% in PG&E's area, during a Category P6 outage. As a potential mitigation, CAISO recommended dropping Tracy pumps.
 - CDWR would like to request more details about these pumps since there are several pumps within this area.
4. On September 22, SCE proposed the Big Creek Corridor project, which is comprised of two new 220kV lines north of Magunden to Rector Substations.
 - CDWR recommends that the CAISO should take into account the local resources in assessing the need for transmission upgrades.
5. Additionally, on September 22, SDG&E presented the proposed reliability projects in SDG&E's area.
 - CDWR requests the approximate costs of all the reliability projects and other reinforcements presented by SDG&E.
 - SDG&E presented reinforcement of Southern 230 kV System Project, which includes adding a second 230kV line from Miguel to Bay Blvd and from Bay Blvd to Silvergate substation. CDWR requests a detailed project cost estimates and more details on the project design.

- SDG&E resubmitted the Valley Inland Power Link project that has an in-service date of 2025 with an estimated cost between \$1.2 and \$4.4 Billion when the project was originally submitted in the 2014-2015 request window. SDG&E described this project as a comprehensive long term regional transmission solution for Southern California. CDWR notes that the cost of this proposed project is extremely high and recommends the CAISO to continue to explore more cost effective alternatives in evaluating the need for this project.
6. Lastly, CDWR encourages the CAISO's modeling team to fully utilize existing transmission capacity when modeling future renewable generation locations and energy amounts injected onto the grid. Building new transmission projects to allow renewable generators full capacity rights generally results in transmission lines being underutilized and will drive up the CAISO High Voltage TAC rate when compared to using existing transmission lines.

CDWR believes the planning process, which includes inputs, studies, and results need to be consistent with the guiding principles of transparency, Stakeholder participation, and clarity. CDWR appreciates CAISO's attempt to apply these principles in the current planning process and looks forward to CAISO's responses to these comments/questions.

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