California Department of Water Resources State Water Project's Comments
for the 2013-2014 Transmission Planning Stakeholder Meeting
December 5, 2013

The California Department of Water Resources-State Water Project (CDWR-SWP) appreciates the opportunity to provide these comments following the 2013/2014 Transmission Planning Process (TPP) Stakeholder meeting held by California Independent System Operator (CAISO) on November 20 and 21, 2013.

CDWR-SWP is concerned by the issue raised in comments by TANC, WAPA, and SMUD during the recent TPP stakeholder meeting. Specifically, those parties commented that the modeling parameters used in the Planning Studies may not be consistent with modeling parameters used in Operational Studies. These parties have stated that the inconsistency appears to result in the planning studies understating the impact on intertie capacity resulting from CDWR-SWP not participating in the COI-RAS. An increase to congestion on the COI, whether located inside or outside the CAISO BAA, would likely impact energy prices in the CAISO. Given the importance of imports to the state of California and the pending efforts to create an Energy Imbalance Market, any such impacts should be clearly understood. CAISO should release the modeling parameters for both studies, disclose any differences between them, and explain why the different parameters were used and whether any inconsistency impacts planning study results, or creates an increased risk of congestion on the COI.

CDWR-SWP notes that it submitted its continued participation in the COI-RAS as a reliability project in this TPP process. While the proposal was not accepted by CAISO, CAISO has indicated in the response email that the CDWR-SWP proposal will be "kept in mind" during the development of the economic analysis. CDWR-SWP confirms that its proposal should be considered as a proposed economic project.

Please contact John Yarbrough (916-574-0665 and johny@water.ca.gov) or Aseem Bhatia (916-574-0674 and abhatia@water.ca.gov) with any questions.