



**CITY OF LODI COMMENTS
2017-18 TRANSMISSION PLANNING PROCESS
DRAFT 2018-2018 TRANSMISSION PLAN AND
TRANSMISSION PROJECT APPROVAL RECOMMENDATIONS
STAKEHOLDER MEETING FEBRUARY 8, 2018**

The City of Lodi appreciates the opportunity to provide comments to the CAISO during the development of the CAISO's 2017-2018 Transmission Plan. The comments below address the material presented at the CAISO Stakeholder meeting on February 8, 2018.

Lockeford-Lodi Area 230 kV Development Project

The Lockeford-Lodi Area 230 kV Development Project approved by the CAISO Board in the 2012-2013 Transmission Plan (Original Project) was put on hold last year for reassessment. At the February 8, 2018 CAISO Stakeholder Meeting for the 2017-2018 Transmission Plan, the Original Project was discussed, with a recommendation that the scope of work be revised. The City of Lodi (City) is providing these comments to clarify its understanding of the revised scope of the project (Revised Project) as presented at the February 8th Stakeholder Meeting.

The Revised Project removes a double circuit 230 kV line originally intended to be constructed between PG&E's Lockeford and PG&E's Eight Mile Substations, one of which would have looped in at a to-be-constructed, City-owned 230/60 kV substation (yet to be named) that will be located adjacent to the City's existing Industrial 60/12 kV Substation. The City hopes that at some future date, the CAISO would revisit this portion of the Original Project as a solution to regional transmission reliability problems, as well as provide the City with added local reliability.

The Revised Project is shown on the attached one-line diagram and described as follows:

- Loop-in the Brighton-Bellota 230 kV line into Lockeford substation.
- Approximately 6 miles of double-circuit 230 kV line from Lockeford to a new Industrial 230 kV substation.
- 2017-2018 TPP estimated cost: \$95 million
- In-service Date: 2023

The one-line diagram for the Original Project as shown in the February 8th presentation identified the City's load, served from a new City-owned Industrial 230/60 kV substation. However, the one-line diagram for the Revised Project neglects to identify the City's load. As a point of clarification (and as shown on the attached PG&E drawings developed for the Original Project), it is the City's understanding that the Revised Project is not intended to alter the City's point of interconnection with PG&E by virtue of eliminating the originally-proposed double circuit 230 kV line between PG&E's Eight Mile and PG&E's Lockeford Substations. The City recommends clarifying this point on the one-line diagram for the Revised Project. Specifically, the City recommends that the one-line diagram be revised to show the new City-owned 230/60



kV substation and the City's load at the City's 230 kV bus connected to a new PG&E 230 kV switching station, both located on the current City-owned Industrial Substation site. In addition, the one-line drawing for the Original Project clearly showed the removal of the three PG&E-owned 60 kV lines currently connected to the City's Industrial 60 kV Substation, but the one-line diagram for the Revised Project mistakenly shows these three PG&E 60 kV lines as still connected. As it is the City's understanding that these three PG&E 60 kV lines will no longer be connected to the City's Industrial Substation after the City's load has been connected at the 230 kV bus of the new City-owned 230/60 kV substation, the City recommends that the one-line diagram be revised accordingly.

Regarding the point made in the February 8th CAISO presentation which states: "No regional (i.e. greater than 200 kV) transmission solutions recommended for approval are eligible for competitive solicitation," (CAISO Presentation at Page 12), the City questions the impetus of this decision as it might apply to the Revised Project. The City submits that the substantial change in scope from the Original Project to the Revised Project, particularly with respect to the need for a new right-of-way that will be required to build a six-mile long, double-circuit 230 kV line from Lockeford to the City's new Industrial 230/60 kV substation, is significant enough to warrant economic competition. For example, the November 30, 2017 Comments submitted by NEET West stated as follows:

"To improve reliability and to mitigate thermal overloads within the Lodi and Lockeford area, NEET West proposed a new Lockeford-Industrial Reliability Project that consists of a new Lockeford-Industrial 230 kV Line and a new Industrial 230 kV bus with a new 230/60 kV Industrial Transformer. The preliminary project cost estimate for this project is \$30 million which is very cost competitive when compared to other considered alternatives.

Given PG&E's cost estimate of \$95 million for the Revised Project, which would only add a one-mile 230 kV double-circuit line to loop-in the Brighten-Bellota 230 kV into Lockeford, the City submits that a competitive solicitation should not be dismissed out of hand.

The City of Lodi is appreciative of the additional analysis the CAISO has invested in the Lockeford-Lodi 230 kV Development Project. The City supports the Revised Project as clarified by these comments, and would like to get the Project underway as soon as possible. However, to ensure that the Revised Project is done on as cost-efficient basis as possible, the City recommends competitive solicitation for the Revised Project.