

**Written comments with CAISO reply  
Submitted after the  
March 9 Stakeholder Meeting regarding the  
Draft 2016 and 2020 Local Capacity  
Requirement (LCR) Results**

**Comments of San Diego Gas and Electric Company  
on the Draft 2016 & 2020 Local Capacity Technical Study Results**

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the 2016 and 2020 Local Capacity Technical Study Draft Results, Stakeholder Meeting on March 9, 2015 prepared by the California Independent System Operator (CAISO). SDG&E's comments appear below.

**The new Pio Pico Power Plant should not be included in the 2016 Base Case.**

The new Pio Pico Power Plant will not reach commercial operations by June 1, 2016. Therefore, it should not be included in the 2016 Base Case for the Local Capacity Technical Study. Pio Pico is expected to reach commercial operation later in 2016.

ISO response: The ISO has confirmed from project developer and other sources (like CEC website) the late 2016 in-service date, therefore this new resource has been removed from the 2016 LCR study.

**The CAB II units should not be included in the 2016 Base Case.**

The CAB II GT units (at Kearny, Miramar and El Cajon) are scheduled to retire at the end of 2015 and be removed. CAB II was supposed to retire at the end of 2014, but new contracts were negotiated to cover 2015 except that Kearny unit one was retired at the end of 2014. Therefore all the remaining GT units of CAB II should not be included in the 2016 Base Case for the Local Capacity Technical Study.

ISO response: Studies confirm the 2016 LCR need for these resources; furthermore the ISO was not able to confirm with the owner of these resources a late 2015 or early 2016 retirement date; as such the ISO has considered them available for 2016 as required per study results.

### **Interactions between the San Diego and Los Angeles areas**

The Local Capacity Technical Study contains interactions between different Local Capacity Areas. One of these interactions is between the San Diego and the west LA areas. It appears the reduced load forecast coupled with additional reactive support has changed the interactions since last year. SDG&E would appreciate a full description of the interactions between the San Diego and the west LA areas. Also, SDG&E requests all the details of how, and in what order, the CAISO made assumptions that impact both areas. This is needed because the order in which certain assumptions are made can impact the final Local Capacity Requirements. Stakeholders need greater transparency about Local Area interactions.

ISO response: The ISO will strive to describe this interaction as best possible; as you stated this interaction has actually reduced from past studies. Please feel free to ask additional question during the stakeholder sessions or during written comments, regarding issues that are still unclear.

**Comments of Pacific Gas and Electric Company  
on the Draft 2016 & 2020 Local Capacity Technical Study Results**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the CAISO's 2015 Local Capacity Technical Study Process. PG&E further recognizes the considerable work that the CAISO staff has put into this year's technical studies to identify the capacity requirement for the various local areas. Upon review of the draft study results, PG&E submits the following inputs to the CAISO during the comment period ending March 23, 2015.

**Comments**

Sierra Area – South of Rio Oso Sub-area

A new Rio Oso-Atlantic 230 kV No. 2 Line is expected to be installed by December 2019. The new line would eliminate the Categories B and C limiting components identified in the draft Yr. 2020 LCR results. PG&E requests the CAISO to reassess the 2020 LCR need for this sub-area.

ISO response: [2020 LCR results have been reassessed with this project in-service.](#)

Kern Area – South of Kern PP Sub-area

To meet local reliability need, PG&E has accelerated the equipment upgrade work at the Kern Power Plant. Effective April 2015, Transformer No. 4 at Kern Power Plant would receive higher capacity ratings. The new ratings are expected to increase transmission capacity and lower the 2016 Kern Area LCR. PG&E requests the CAISO to reassess the 2016 and 2020 LCR need for this sub-area by taking consideration of the new transformer ratings.

ISO response: [2016 LCR results have been reassessed with this project in-service. 2020 LCR results did not change since this was not the limiting equipment.](#)

#### Greater Bay Area - San Jose Sub-area

There is a special operational set-up for the eastern San Jose transmission system. When the set-up is in effect during the summer season, thermal overload should not occur on the Piercy-Metcalf 115 kV Line. PG&E requests the CAISO to review and incorporate this set-up into its studies. Furthermore, depending on the generation dispatch inside and outside of the San Jose area, the LCR need for the sub-area could be different, which could influence the overall Greater Bay Area LCR need.

ISO response: The current operating arrangement is to radialize loads in the area, after all other system readjustment have been depleted (including use of local resources). The current practice may or may not be applied in future years since the system configuration will change after the Evergreen-Mabury 60 to 115 kV Conversion project (adds another tie into this small sub-area and makes the reliance on local resources a bit stronger). The ISO will continue to monitor this future problem and solutions to it.

#### Greater Bay Area – Llagas Sub-area

Voltage drop violation was identified as the limiting factor resulting in LCR need for the sub-area. PG&E is not certain about the violation and requests the CAISO to double check its findings.

ISO response: Concern confirmed.

Finally, Marsh Landing, Los Esteros, and Russell City are all existing power generating plants. It is misleading to show these facilities as new additions on the March 9, 2015 presentation. The CAISO is also advised to verify the status of the Cardinal Co-gen, and Gilroy Co-gen units in the LCR studies.

ISO response: ISO will remove these units from “new resources” list as to avoid confusion. ISO has confirm that the Cardinal Co-gen and the Gilroy Co-gen are operational as of April 6, 2015. However there is high indication that Cardinal Co-gen will retire soon, ISO will continue to



monitor and if needed will change the status of this resource in the final 2016 and 2020 LCR reports.

PG&E looks forward to continued participation in the local capacity technical study process.