

## Stakeholder Comments

Submitted by	Company or Entity	Date Submitted
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### Comments Regarding 2020-2021 Transmission Planning Process

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The Imperial Irrigation District (“IID”) thanks the California Independent System Operator Corporation (“CAISO”) for the opportunity to submit comments in connection with the 2020-2021 Transmission Planning Process (“TPP”), including the 2020-2021 Unified Planning Assumptions and Draft Study Plan and February 28, 2020 stakeholder meeting.

IID understands that Smart Wires will submit comments in this stakeholder process to propose installation of a modular power flow technology, the SmartValve, to the Imperial Valley – El Centro 230 kV line (S-Line). Smart Wires is a provider of modular power flow technology worldwide, and IID welcomes the discussion of innovative solutions to power delivery systems.

Upgrades to the S-Line have been identified as an economic upgrade in prior instances of the TPP, and IID is committed to a solution consistent with the concept approved previously in the CAISO’s TPP and is disinclined to alter that path.

IID is and will remain the exclusive owner of the S-Line. IID is governed by a locally constituted and elected board of directors and is not subject to the planning direction or ratemaking authority of state or federal regulatory agencies. Whether before or after the S-Line upgrades are completed, IID’s express consent would be required for placement of SmartValve devices on IID’s Imperial Valley-El Centro 230 kV line.

Even if the concept proposed by Smart Wires were further explored, the proposal raises further questions that IID and the CAISO would need to resolve prior to entertaining the kind of project proposed. For example, how would Smart Wires seek to recover the costs of its investment? Is recovering its costs even possible

when the infrastructure sought to be placed on a third party's system is one that is non-jurisdictional for Federal Energy Regulatory Commission ratemaking purposes and Smart Wires is a third-party unaffiliated with an existing Participating Transmission Owner? Reactive devices appear to have been considered in other TPP cycles. For example, IID is aware of the Gates reactive power proposal<sup>1</sup> and Round Mountain 500 kV Area proposal,<sup>2</sup> each of which involved reactive devices. However, both projects involved Pacific Gas and Electric Company's ("PG&E") infrastructure, which is already under CAISO Operational Control. Other questions include, what kind of metering and visibility on the part of the CAISO would be required under Smart Wires' proposal, and would such metering and visibility be feasible or effective prior to the S Line upgrades being completed? IID submits that it is critical for the CAISO to analyze these questions before considering the proposal in the context of criteria used in the TPP.

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<sup>1</sup> See the following link:

<http://www.caiso.com/Documents/Gates500kVDynamicReactiveSupportDescriptionandFunctionalSpecs.pdf>

<sup>2</sup> See the following link:

<http://www.caiso.com/Documents/RoundMountain500kVAreaDynamicReactiveSupportDescriptionandFunctionalSpecs-Revision1.pdf>