

**Imperial Irrigation District's Comments  
to the 2013/2014 CAISO Transmission Planning Process  
Preliminary Reliability Assessment Results**

**October 10, 2013**

Imperial Irrigation District (IID) appreciates the opportunity to provide the following comments to the 2013/2014 CAISO Transmission Planning Process (TPP) Preliminary Reliability Assessment Results. IID is a transmission owner and operator and a certified Balancing Authority (BA) in Southern California with two points of interconnection with the CAISO BA. There is a significant amount of renewable energy being developed in the Imperial Valley that is connecting to the CAISO near the Imperial Valley Substation (IV Substation). As such it is important that IID and the CAISO closely cooperate in order to ensure that affected system issues are managed and the interconnection of new generation does not impact reliability.

IID was recently selected by the CAISO to be the project sponsor for the Imperial Valley Policy Element. IID is working closely with CAISO on the development of this project. In addition, IID is developing a transmission plan of service to facilitate the interconnection of new renewable generation in the Imperial Valley. This plan of service may also address several other issues affecting Southern California, including: (1) assist in replacement of generation due to the retirement of San Onofre Nuclear Generation Station; (2) eliminate the need for flow control devices electrically near the IV Substation; and (3) provide voltage support on the SDGE system.

While not identified in the CAISO's Preliminary Reliability Assessment materials, SDG&E has included a multi-page description of flow control devices that it proposes to be considered to mitigate flows on the IID system. This proposal mirrors what SDG&E proposed, and the CAISO rejected, last year. IID opposes the proposal to place a flow control device, or phase shifter, at or electrically near the IV Substation at this time. As SDG&E's description makes clear, SDG&E is proposing unilateral modifications to IID facilities in a manner inconsistent with SDG&E's obligations under the California Transmission System Participation Agreement ("Participation Agreement") to which IID and SDG&E are parties. This unilateral proposal also runs counter to requirements for coordinated planning and the numerous discussions that have been held between IID, SDG&E, the CAISO as substantial generation has been added around the IV Substation.

While IID does not have specific numbers to provide at this time, it is IID's judgment that actual upgrades to IID's system would be lower in cost and provide greater system capabilities as compared to SDG&E's proposed flow control devices. IID looks forward to working with the CAISO, SDG&E and other stakeholders to craft durable and cost effective upgrades to the transmission system that will enable achievement of the State's renewable energy portfolio and greenhouse gas goals.

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