

October 6, 2016

## **Imperial Irrigation District (IID) comments on the 2016-2017 CAISO Transmission Planning Process Stakeholder Meeting September 21-22, 2016**

IID appreciates the opportunity to comment on the ISO presentation during its September 21-22, 2016 Stakeholder meeting discussing the 2016-2017 Transmission Plan results and recommendations.

IID comments are focused on the “San Diego Gas & Electric Bulk Transmission Preliminary Reliability Assessment Results”.

1. IID appreciates CAISO engineers’ analysis in which CAISO has identified one IID facility overload caused by five CAISO contingencies. IID is very supportive to work with CAISO in mitigating this overload such that it provides a superior technical and economic solution for the benefit of all California ratepayers.
2. On slide # 11 of the above presentation, CAISO has identified IID’s Imperial Valley – El Centro line (aka “S” line) as overloaded under one contingency condition. Although the details of overload levels are not on this slide, those are found in the Preliminary results posted on the CAISO website. These details indicate **five** contingencies would overload the “S” line in the range of 100% to 139%. The proposed mitigation offered by CAISO is to use Operating procedure to manage the reliability of the Grid. IID’s question is: What other mitigation measures were considered and evaluated by CAISO besides Operating Procedure?
3. “S” line emergency rating is 407 MW, meaning an overload of **139%** would load this line to 566 MW (an increase of 159 MW above emergency rating). The protective relays will trip this line immediately if this loading was to occur in real time, thus initiating cascading events. IID understands the CAISO operating procedure, in fact, decreases the pre-contingency flow on the N.Gila-Imperial Valley 500 kV line (NG-IV) to avoid this kind of overloading and consequent cascading events. In this scenario, CAISO has to curtail pre-contingency NG-IV flow by about 480 MW. IID’ question is two-fold: (1) Can CAISO operators curtail about 480 MW of NG-IV flow typically within 30 minutes? (2) Is there a better option than pre-contingency curtailment?
4. Given the history and the devastating impact the loss of the Southwest Power Link (SWPL) had on the grid on 9/8/11, IID believes that it is irresponsible to rely on real time to mitigate such an extreme overload. IID encourages CAISO to explore other alternatives including upgrading the “S” line.