

October 6, 2017

## **Imperial Irrigation District (IID) comments on the 2017-2018 CAISO Transmission Planning Process Stakeholder Meeting September 21-22, 2017**

IID appreciates the opportunity to comment on the ISO presentation during its September 21-22, 2017 Stakeholder meeting discussing the 2017-2018 Transmission Plan results and recommendations.

IID comments are focused on the “SDG&E Main System Preliminary Reliability Assessment Results”.

1. IID appreciates CAISO engineers’ analysis in which CAISO has identified one IID facility overload caused by four CAISO contingencies. IID will be happy 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 # 23 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 **four** contingencies would overload the “S” line in the range of 101% to 174%. The proposed mitigation offered by CAISO is to “rely on the ISO market congestion management and Operation procedure.” Did CAISO consider any other mitigation measures to select the best from reliability and economic perspective?
3. “S” line emergency rating is 407 MW, meaning an overload of **174%** would load this line to **726** MW (an increase of 319 MW above emergency rating). The protective relays will immediately trip this line if this loading was to occur in real time, thus initiating cascading events. IID understands the CAISO operating procedure which in fact, would require decreasing 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. Also, since the overload occurs under P3 and P6 contingency conditions, CAISO has 30 minutes to curtail flow on the NG-IV line by about 1270 MW. Can you elaborate on how this large curtailment can be accomplished within 30 minutes?
4. CAISO is well aware of the devastating impact the loss of the Southwest Power Link (SWPL) had on the grid on 9/8/11. IID is very concerned that similar impact may occur again if CAISO’s congestion management fails to fully mitigate the “S” line overload which may trigger cascading. IID encourages CAISO to explore other alternatives including upgrading the “S” line.