

March 3, 2017

Imperial Irrigation District (IID) comments on the 2016-2017 CAISO Transmission Planning Process Stakeholder Meeting February 17, 2017

IID appreciates the opportunity to comment on the ISO presentation during its February 17, 2017 Stakeholder meeting discussing the 2016-2017 Transmission Plan report and recommendations.

IID comments are presented below:

1. IID appreciates CAISO engineers' analysis in which IID's updated transmission model was used and the results confirmed IID's internal findings that IID's "S" line (Imperial Valley – El Centro 230 kV line) will be overloaded for the outage of N.Gila – Imperial Valley 500 kV line. This overload has been identified at least at four locations in the presentation especially when discussing LCR study, economic evaluation, and 50% renewable study results. What is missing in the presentation is that no mitigation has been proposed. IID is offering its staff to work with CAISO staff in mitigating this overload in a way that is practically achievable and is economical for the benefit of all California ratepayers.
2. On page 123 of the presentation, IID contingency Coachella – Mirage and Ramon – Mirage with RAS is identified as causing "S" line overload. What "RAS" was applied?
3. On page 124, Miguel 230/500 kV transformers #1 and #2 are shown overloaded and a potential mitigation is identified. On this same slide "S" line is shown overloaded but no mitigation is specified. Consistency issue?
4. While discussing 50% renewables on page 141 of the presentation, "S" line constraint shows up again for Greater Imperial and Riverside east and Palm Springs area analysis. What are CAISO thoughts in finding a long term solution to this bottle neck?

The following comments are on the 2016-2017 Transmission Plan report dated January 31, 2017 (report)

5. CAISO report did not provide enough details about overloading of IID's "S" line so the relevant portion of Appendix C, "San Diego Bulk Transmission" was reviewed. The results indicated that "S" line was overloaded in the range of 100% to 139% under various contingencies throughout the study span of 10 years. Just in 2018, it was overloaded to 123% and 139% in Summer peak conditions. How is it that these significant results were not brought forward in the body of the report?
6. CAISO has rightfully identified 102% loading of the "S" line on page 166 Table 3.2-2 while discussing deliverability results. A reduction of 20 MW renewable generation is also identified to mitigate overload. IID would like to see similar representation of the Reliability results in which 139% overload is identified. How much generation curtailment would be necessary to mitigate this overload?

7. Table 6.4-7 on page 276 identifies IID MIC of 702 MW modeled under Import Assumptions for 2017. On page 205 it says MIC from IID is 702 MW in 2021. Which statement is correct?
8. First line on page 1 of the report says “Forward to DRAFT 2016-2017 Transmission Plan”. It seems like a typo. Forward should be “Foreword” and it should be the only word on the top line.