

2019-20 Transmission Planning Process

Submitted by	Company	Date Submitted
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PG&E appreciates this opportunity to comment on the Draft Plan in the 2019-20 Transmission Planning Process (TPP) published on January 31, 2020 and discussed in the stakeholder meeting on February 7, 2020.

In its review of PG&E’s multi-pronged North Oakland Area Reinforcement project, the Draft Plan states: “Rebuilding of [the] Moraga-Oakland X 115 kV four-line path with three lines and reconductoring of the Moraga-Claremont #1 & #2 115 kV lines are primarily driven by CPUC GO-95 compliance and the work will be performed under PG&E’s maintenance budget. The ISO reviewed and concurs [with] the proposed scope of work.”¹

PG&E agrees that these project elements fit the definition of safety and maintenance projects that replace existing grid facilities and equipment due to age, conditions, or similar reasons, and that CAISO’s role in such cases is to study and concur with the proposed scope. However, PG&E notes that the Moraga-Oakland X project as recommended is not a simple “like-for-like” upgrade of the existing facilities, as the project entails work that will result in changes to grid topology, by removing one of the four lines, and changes to the capacity of two other lines that run in parallel. Changes to topology and capacity can impact the Bulk Electric System (BES). Therefore, while PG&E thanks CAISO for its concurrence with the proposed scope, PG&E requests that CAISO confirm that it has reviewed the new proposed capacity and system topology to ensure that they meet all applicable NERC Bulk Electric System (BES) reliability standards.

PG&E thanks CAISO in advance for this additional confirmation.

¹ http://www.caiso.com/Documents/Draft_2019-2020TransmissionPlan-January312020.pdf, p. 107.