



**Comments of Pacific Gas and Electric Company  
on the Draft CAISO 2013-2014 Transmission Plan and  
February 12, 2014 Stakeholder Meeting**

| Submitted by                      | Company  | Date Submitted           |
|-----------------------------------|--|--------------------------|
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**Comments**

Pacific Gas and Electric Company (PG&E) continues to be committed to participating in the annual Transmission Planning Process. PG&E submits these comments on the Draft 2013-2014 Transmission Plan and February 12, 2014 stakeholder meeting. We look forward to continued participation in the process, and appreciate the significant work that the CAISO staff put into developing this year’s draft Transmission Plan.

**San Francisco Peninsula Reliability Concerns**

PG&E appreciates the CAISO’s continued efforts to assess the reliability needs of the San Francisco Peninsula. PG&E is providing separate comments on the San Francisco Peninsula Reliability Concerns that will be posted to the Market Participant Portal.

**PG&E Local Areas Assessment**

PG&E’s comments below are organized to reflect the organization of the transmission plan for the convenience of the CAISO and other stakeholders; however, the order of comments is not necessarily reflective of their order of importance.

**2.5.8.3: Assessment and Recommendations**

**Estrella Substation Project**

The Estrella Substation Project scope description calls for looping the 230 kV bus off the Templeton-Gates 230 kV line. PG&E urges the CAISO to modify the project scope to require looping of the Morro Bay-Gates No. 2 230 kV line instead. Modifying the scope as recommended will enable balanced power flows on the parallel Morro Bay-Gates No. 2, Templeton-Gates, and Morro Bay-Templeton 230 kV lines improving transfer of power from Morro Bay to Gates Substations and will better utilize existing transmission capacity. Additionally, looping the new substation onto the Morro Bay-Gates No. 2 230 kV line will

improve reliability during 230 kV line clearances. The CAISO proposed arrangement would connect both Estrella and Templeton in series and would put both substations at risk for a single line (L-1) outage during a line clearance which is highly undesirable from a reliability perspective. This comment applies to all instances where the Estrella Substation Project scope is mentioned in the Draft Transmission Plan and its appendices.

### **Local Preferred Resources Assessment (Non-Conventional Transmission Alternative Assessment)**

PG&E supports the CAISO's movement to more fully consider the ability of demand-side resources to mitigate identified deficiencies in local areas and strongly encourages the inclusion of preferred resources that offer a cost-effective and reliable alternative to conventional transmission. PG&E has been forthcoming in the planning process and provided extensive locational data to aid the CAISO in its planning process, and we strongly encourage the CAISO to consider that information in their unified planning assumptions.

The CAISO should update its white paper clarifying the process and criteria for non-conventional resources to meet transmission needs based on lessons learned from the 2013-2014 pilot. Since stakeholders provided comments on the CAISO's White Paper on Non-Conventional Alternatives (<http://www.aiso.com/Documents/Paper-Non-ConventionalAlternatives-2013-2014TransmissionPlanningProcess.pdf>) issued on September 4, 2013, the CAISO has not provided further information or instructions to the stakeholders on key implementation issues beyond that provided in the 2014-2015 TPP draft study plan. In the context of the State's Loading Order, the CAISO should adopt preferred resources if they can provide comparable reliability to the conventional approach in a more cost-effective manner consistent with PUC code section 454.5(C) which states that: *The electrical corporation shall first meet its unmet resource needs through all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.* (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=puc&group=00001-01000&file=451-467>)

### **Economic Planning Study**

During the 2013 request window, PG&E submitted a request to the CAISO to undertake an Economic Planning Study to evaluate the congestion associated with the Table Mountain 500/230 kV Transformer. While PG&E appreciates the CAISO's review of this issue in the bulk system reliability assessment, PG&E encourages the CAISO to continue to evaluate transmission upgrades that will provide economic benefits by relieving Table Mountain congestion and avoiding Real-Time Congestion Imbalance Offset Charges. PG&E also encourages the CAISO to further consider the installation of the second Table Mountain 500/230 kV transformer, as proposed by PG&E, as part of the long term solution to this issue.

Similarly, PG&E appreciates the CAISO's recognition of the Table Mountain – Tesla Transmission project submitted by PG&E into the request window. This project was submitted as a conceptual plan that requires further evaluation. PG&E supports the CAISO's position on the need to continue to work with PG&E on any upgrades required in the future in order to preserve COI's existing import capability and to avoid curtailment on existing resources as well

as avoid potential impact of any new resources that may be connected to the transmission system north of the Tesla substation.

## **Transmission Project List**

### **7.3: Competitive Solicitation for New Transmission Elements**

#### **Wheeler Ridge Junction Project**

The Draft Transmission Plan incorrectly defines the Wheeler Ridge Junction station scope as including a 230/70 kV component. The Wheeler Ridge Junction Station project substation scope should be for a 230/115 kV substation. This comment applies to all instances where the Wheeler Ridge Junction Station project scope is mentioned in the Draft Transmission Plan and its appendices.

#### **Description and Functional Specifications for Transmission Elements Eligible for Competitive Solicitation**

The functional specifications for the Estrella and Wheeler Ridge Junction substation projects in Appendix F of the Draft Transmission Plan are lacking detailed data required. PG&E will be providing the CAISO with separate set of specific comments on the functional specifications for these two projects which will align the specifications with current PG&E design criteria and standards for new substation equipment.