



## Comments of Pacific Gas and Electric Company on the Draft 2020 and 2024 Local Capacity Technical Study Results

Submitted by	Company	Date Submitted
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Following the stakeholder meeting on March 14, PG&E has reviewed the draft study results for its service areas. Below are PG&E’s inputs to the CAISO during the comment period ending March 26, 2019.

### Comments

#### Kern Area: Westpark Sub-area

Kern-Westpark 115 kV #1 and #2 lines have been identified as the first limiting facility in the Westpark sub-area. PG&E has recently completed the Kern-Westpark 115 kV #1 and #2 line rerate project, and PG&E is in the process of updating the CAISO Transmission Register. With this project in service, the sub-area LCR need and deficiency should be reduced. PG&E requests the CAISO to re-evaluate the LCR study results based on the latest Kern-Westpark 115 kV #1 and #2 line rerate project information. Model change file for the project will be sent to the CAISO separately.

#### Kern Area: Kern PP 70 kV Sub-area

Kern PP 70kV bus tie has been identified as the first limiting facility for the Kern PP 70kV sub-area in Years 2020 and 2024. Upgrading the Kern PP 70kV bus limiting element is part of the Kern PP 70kV Bus conversion project. After the upgrade work is done, bus tie ratings will increase and the sub-area LCR need/deficiency will decrease. The target in-service date of the upgrade work is May 2020. PG&E will monitor and expedite the work to ensure the project is on schedule. PG&E requests the CAISO to re-evaluate the LCR study results based on the latest Kern PP 70kV bus tie project information. The project model change file will be sent to the CAISO separately.

### Greater Bay Area: Oakland Sub-area

The study results presented for the Oakland sub-area identified a 27MW LCR need in Year 2024 even with the Oakland Clean Energy Initiative (OCEI) project in service. The OCEI project covers a combination of DERs, energy storage, substation upgrades and operational (switching) solutions, which together are expected to reduce if not eliminate the sub-area LCR need. PG&E requests the CAISO to ensure all these project components are considered when addressing the remaining P6 outage issue in the sub-area.

PG&E looks forward to the next stakeholder meeting, where draft final results will be presented and discussed.