

# Comments of Pacific Gas and Electric Company on the 2013/2014 Transmission Planning Process November 20-21, 2013 Stakeholder Meetings

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the CAISO’s annual Transmission Planning Process (TPP). PG&E offers the following comments on the material presented during the 2013/2014 TPP stakeholder meetings held on November 20-21, 2013. PG&E looks forward to continuing to participate in the current TPP cycle.

### *Reliability Projects with Costs Less Than \$50 Million*

PG&E supports the CAISO’s proposal for management approval of the set of reliability projects within the PG&E area with costs less than \$50 million, as presented to stakeholders on November 21, 2013.

### *PG&E Area Policy Driven Powerflow and Stability Study Results*

PG&E generally agrees with the CAISO’s findings and conclusions as presented in slides 2-41 and offers the following specific comments:

- In the North Valley Area Summer Peak Results section, on slide 27 the CAISO has proposed an SPS to curtail Colusa to mitigate the overload on the Delevan-Cortina 230 kV Line. In order to validate the reliable operation of the SPS, PG&E requests the CAISO to provide additional details of the CAISO’s assessment of any interaction of the proposed SPS with existing RAS and SPS and coordination with other protection systems in the area. Additionally, since the proposed mitigation requires an existing generator to be curtailed, PG&E requests the CAISO to clarify whether it can modify an interconnection agreement with an existing generator by installing an SPS.
- PG&E wishes to call attention to the comments it submitted to the CAISO on November 19, 2013 on the 2012/2013 Conceptual Statewide Transmission Plan wherein PG&E noted that the Desert Renewable Energy Conservation Plan (DRECP) has made substantial progress towards completion this year. The DRECP is a collaborative multi-agency effort and is a significant component of California’s renewable energy planning efforts. PG&E reiterates in these

comments its recommendation that the CAISO monitor the status of the DRECP for potential incorporation in next year's conceptual statewide plan update.

### **Policy Driven Planning Deliverability Assessment Results – PG&E Area**

On slides 3-6, the CAISO identifies a number of line overloads for which no specific mitigation is proposed, rather the slides note that mitigation is “under evaluation.” Based on statements made by CAISO staff during the November 20, 2013 stakeholder meeting, PG&E understands that mitigation recommendations for the overloads will be included in the Draft Transmission Plan, which will be posted in January 2014. PG&E looks forward to reviewing and assessing the proposed mitigation at that time.

### **Economic Study Results**

While PG&E does not have enough information at this time to take a position on the specific projects found to be or not to be economic, PG&E applauds the CAISO for undertaking an analysis that includes an expanded set of benefits as part of the CAISO's analytic framework for evaluating proposed economic transmission projects. Beginning with the next TPP cycle, PG&E continues to encourage the CAISO to enhance the economic study methodology through stochastic modeling and evaluating a larger range of potential customer benefits as part of its analytic approach.

Finally, PG&E notes that historically the CAISO market has experienced substantial congestion due to the projected thermal loading on the Table Mountain 500/230 kV transformer following a Table Mountain South Double Line Outage contingency. As part of the current TPP cycle, PG&E submitted a request to the CAISO for it to complete an Economic Planning Study to evaluate the congestion associated with this binding element. While PG&E appreciates the CAISO's review of this issue in the 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.

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