

Comments of Pacific Gas and Electric Company on the Draft 2018 and 2022 Local Capacity Technical Study Results

Submitted by	Company	Date Submitted
<i>Ronnie Lau</i> prl6@pge.com 415-973-7092	<i>Pacific Gas and Electric Company (PG&E)</i>	<i>March 23, 2017</i>

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the CAISO’s 2017 Local Capacity Technical (LCT) Study Process. PG&E recognizes the considerable work that the CAISO staff has put into the technical studies for the identification of local capacity requirements. Upon review of the draft study results, PG&E submits the following inputs to the CAISO during the comment period ending March 23, 2017.

Comments

General

At the March 9 stakeholder meeting, PG&E learned that the CAISO has incorporated peak shift into its local capacity technical studies for some or all of the southern areas in the CAISO footprint. PG&E requests the CAISO to confirm whether in future studies it will examine the peak shift effect and document its findings for each of the PG&E’s local areas, as well.

North Coast/North Bay – Lakeville Sub-area

For the 2022 LCR need, the CAISO reported thermal overload on the Moraga-Sobrante 115 kV line following the Vaca Dixon-Tulucay and Vaca Dixon-Lakeville 230 kV lines outage (See North Coast/North Bay Area Presentation - Slide No. 11). In the past, the Eagle Rock-Cortina 115 kV line located in the North Coast area had been identified as the overloaded equipment. It is not clear how the equipment overload migrated to the Bay Area. PG&E recommends the CAISO reviews its findings and lists out the assumed Pittsburg area generation for added information.

The Vaca Dixon-Lakeville 230 kV Reconductoring Project has now been officially cancelled by the CAISO.¹ PG&E is working to seek higher wind-speed emergency ratings for the line, future LCR needs for this sub-area should take into account the new line ratings.

Greater Bay Area

The Tesla-Newark 230 kV Path Upgrade Project was included in the 2018 and 2022 study cases (See Greater Bay Area Presentation – Slide No. 4). This project is also cancelled² and it should be removed from the study assumptions.

The Morgan Hill Area Reinforcement Project (Spring Substation) was assumed to be in-service by 2022. However, this project is on the list of projects that the CAISO has placed on Hold. PG&E has been asked not to proceed with permit filings until the CAISO completes its review.³ The Evergreen-Mabury 60 kV to 115 kV Conversion Project was modeled in the 2022 Greater Bay Area study case. The project should be listed on Slide No. 4 of the presentation.

With the change in status for the various projects in the PG&E service territory, it is essential to document which projects are included or excluded or have no impact on the LCR study results. PG&E understands the CAISO has taken the LCR needs into consideration before a project should be cancelled or not. However, for any areas where the cancelled projects have not been taken into account, the LCR needs should be re-determined. Adding clarity and consistency is particularly important to the 2018 LCR need determination.

PG&E looks forward to continued participation in the local capacity technical study process.

¹ See http://www.caiso.com/Documents/Board-Approved_2016-2017TransmissionPlan.pdf at p.102.

² Ibid, p.102

³ Ibid, p.103