

- 1) ISO presentation slide #190 indicated the TL 631 overloads for the contingency loss of TL 632 in year 2014. This reliability violation might have been a result of ISO's power flow case modeling incorrect line impedance for the TL631. SDG&E will provide updated line impedance data to the CAISO to verify the results.
- 2) ISO presents some system reliability reinforcement for the near term no-SONGS scenario, however did not exhibit any long term solution that would address the shortage of MW and MVAR if SONGS are permanently out-of-service. Is it ISO's vision that SONGS will only be out of service **temporarily**? If not, reliability projects that are urgently needed, such as synchronous condensers or bulk power transmission lines, all require long-lead time and need to have ISO's approval in a timely manner.
- 3) ISO typically limits its reliability study only to the compliance of NERC, WECC, and CAISO reliability criteria, and approves projects only to the extent of mitigating Category B violations **if** there is **no** generation re-dispatch available. SDG&E urge ISO to look beyond the minimum reliability criteria requirement and take into account: i) the possibility of loss of critical / major loads, value of service; ii) the cost and operation constraints associated with re-dispatch of generation; iii) the possibility that a single major improvement may mitigate the need for multiple small or incremental upgrades, avoid the risk of making multiple upgrades to the same facilities, and result in a net savings to ratepayers.
- 4) ISO presentation slide #224 indicated ISO's interest in examining non-transmission alternatives to address the transmission reliability issue; then on the following slide indicated "ISO has no ability or authority to ensure that any proposed non-wire alternative [NWA] is actually implemented". Question and comment are: i) How does ISO evaluate the level of the commitment that the NWA will actually materialize on time; ii) the ISO needs to provide the analysis supporting its determination that a NWA is preferable to a wires alternative. This analysis is needed to support the PTO's efforts to secure the applicable regulatory approvals of, and cost recovery for, the NWA.
- 5) Unlike last year, ISO no longer has a separate submission window for policy driven and economic projects. It appears all proposed projects have to go in the same reliability window. What are the criteria to differentiate the policy driven/economic projects from the reliability projects? Stakeholders need a clear definition.
- 6) In order to comply with TPL-002 and TPL-003, SDG&E must present a project or operating procedure to remove identified overloads. The ISO has stated that they will re-evaluate certain projects in future planning cycles without stating what will be re-evaluated. To be compliant, the ISO should accept SDG&E's project and state that it will be re-evaluated in subsequent planning cycles.