



Powering The Center of What's Possible

October 10, 2019

Silicon Valley Power Comments on the 2019-2020 Transmission Planning Process Preliminary Reliability Assessment Results and PTO Request Window Submissions

Submitted to: regionaltransmission@caiso.com

The City of Santa Clara *dba* Silicon Valley Power (SVP) appreciates the opportunity to comment during the development of the 2019-2020 Transmission Plan. SVP has reviewed the results of the CAISO reliability assessment for the SVP/San Jose areas and noted the lack of any mitigations suggested by the CAISO and the lack of Request Window proposals by PG&E for this particular area. The CAISO assessment shows overloads on the Newark-Northern Receiving Station (NRS) #1 115kV circuit as early as 2024 and the Newark-NRS #2 115kV circuit in the 2029 Summer Peak Assessment¹.

SVP believes some long-term solutions should be developed now for the area. Past history shows it often takes a long time to complete approved projects. The recent reconductoring of the 2.1 mile NRS-SRS 115kV circuits was approved in the 2013 TPP, and it was just placed in service this year (early 2019). We believe it is important to timely develop and approve a plan to relieve the overloads delineated above. The identified 2024 overloads need attention now because the Newark-NRS 115kV circuits traverse the Don Edwards Preserve, and thus a related project would likely encounter delays due to any mitigation work involving those lines.

The number of overloads increase substantially and begin even sooner in the sensitivity cases. SVP believes that the results of the sensitivity cases should be thoroughly considered in developing a plan of service for the area. SVP load growth projections are primarily driven by large scale data center block loads that do not follow the CEC load models. SVP currently has new data centers in its service territory that have recently finished construction and will be ramping load soon. Additional customers are in the final stages of the approval process for data center substations requiring more than 100MW in the next two years. There are six more potential projects (mostly data centers) requiring an additional 300MW over the next 3-5 years.

The amount of new data center interest and construction has increased dramatically since the development of the bases cases for this TPP cycle. SVP believes there is a strong potential to

¹ 2019-2020 ISO Reliability Assessment - Preliminary Study Results for the **PG&E Greater Bay area**, August 15, 2019, Page 11 and 12 of 31.



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exceed the forecast shown in the base cases for the TPP. The necessity to plan for projects to alleviate future overloads projected in the base cases and sensitivity cases is critical given the timing of these new loads. SVP would like CAISO and PG&E to develop mitigation plans now as they continue to monitor load growth in the area.

SVP appreciates the opportunity to comment on the 2019-2020 Transmission Plan Reliability Assessment Results and acknowledges the significant effort of the CAISO and PG&E staffs to develop this material.

If you have any questions concerning these comments, please contact Jeevan Valath at JValath@SantaClaraCA.gov.