

**SVP Comments on the 2017-18 Transmission Planning Process**  
**Preliminary Reliability Assessment Results and PTO Request Window**  
**Submissions**

Silicon Valley Power (SVP) appreciates the opportunity to comment during the development of the 2017-18 Transmission Plan. The comments and questions below address both the posted preliminary assessment and material presented at the CAISO Stakeholder meeting on September 21-22, 2017.

**Contingency Modelling**

SVP is concerned that the contingency files for the San Jose/De Anza sub-areas of the Greater Bay Area are not sufficiently complete to capture overlapping outages involving both SVP and Pacific Gas and Electric (PG&E) facilities. As we view the posted contingency files used in the assessment for this area, we only see contingencies on the PG&E system being modelled. The PG&E and SVP systems are operated in parallel in this area so that contingencies on one system can impact the power flows on the other. For example:

- The current system operating limit for managing the flow on the PG&E NRS-SRS #1<sup>1</sup> 115 kV circuit monitors the flows on both the PG&E and SVP systems.
- While the preliminary assessment results show potential overloads on the PG&E NRS-SRS #2 circuit starting in 2019 Summer Peak, our analysis shows even higher overloads when overlapping PG&E and SVP contingencies are considered.

Therefore, SVP recommends that the contingency list be expanded to include SVP contingencies as well as PG&E contingencies to capture the full exposure on these parallel systems.

**Load Trends and Local Activity**

The heat wave on September 1 set all-time record demand of 587 MW in the SVP system. PG&E's demand in the local area may have also experienced a similar jump. Furthermore, SVP has become an area of interest for energy intensive industries such as data centers. This change is being driven by recent industry technology changes on data center design and location. As such, SVP anticipates a significant increase in its load forecast during the next planning cycle. Although SVP is still finalizing its updated forecasts for the next 10-year window, SVP expects the transmission constraints in this area to increase and shift forward in time. SVP therefore urges the CAISO to not delay in acting upon the transmission issues already appearing in this assessment.

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<sup>1</sup> Northern Receiving Station – Scott Receiving Station #1 115 kV

## **Transmission Projects**

### **NRS-SRS #2 115 kV Line Upgrade**

The CAISO Preliminary Assessment shows an overload of up to 110% in 2019 and 122% in 2027. This circuit is on the same structure as the NRS-Scott No. 1 115 kV circuit that the CAISO has approved for reconductoring. Once SVP completes its short circuit upgrades (including closing CB 392) at SVP's Northern Receiving Station (NRS) next spring, these two circuits will be electrically in parallel. We believe that the No. 2 circuit should be reconductored as soon as possible, hopefully at the same time as the No. 1 circuit and understand from the CAISO's response at the stakeholder meeting that the CAISO has approached PG&E about this plan. As such, this work should be explicitly included in the Transmission Plan. Whether this work is done at the same time as the No.1 circuit or not, it should be accomplished as soon as possible to minimize reliability issues with serving load in the San Jose/De Anza sub-areas.

The No. 2 circuit issue is now a reliability issue and the issue will get worse over time. A mitigation plan needs to be in place to address reliability issues of serving SVP system, and surrounding PG&E system, area loads.

### **Trimble-San Jose B 115 kV**

This year's assessment shows a P2 contingency (115 kV bus tie breaker failure @ Metcalf) loading on the Trimble-San Jose B 115 kV circuit of 105% in 2019 and increasing to 111% in 2027. Also the posted assessment results indicate other contingencies begin to emerge as causing overload or near overload conditions. The presentation on the bulk system assessment indicates a P1 overload of 102% and a P6 overload of 147%.

Last year the CAISO concurred with PG&E's proposal for the Caltrain Electrification Project in its approved Transmission Plan, which would not only add a large block load at PG&E's FMC Substation, but also upgrade this circuit. However, it appears that neither the load increase nor the upgrade have been modeled in the base cases. Therefore, it is difficult to discern whether the approved upgrades will be sufficient to address the issues identified in this assessment as well as accommodate the Caltrain load. Furthermore, as the assessment results indicate that there are capacity issues on this circuit irrespective of the Caltrain Electrification Project, the upgrade of this circuit should progress independently of the Caltrain project.

SVP looks forward to continuing to work with PG&E and the CAISO to ensure that adequate transmission capacity will be realized in a timely manner to support the reliability of electric service for the economic growth in the San Jose/De Anza sub-areas of the Greater Bay Area.

If you have any questions concerning these comments, please contact  
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