

TANC COMMENTS
ON THE CAISO'S 2018-2019 TRANSMISSION PLANNING PROCESS
NOVEMBER 30, 2018

The Transmission Agency of Northern California (TANC) appreciates this opportunity to provide comments on the California Independent System Operator's (CAISO) 2018-2019 Transmission Plan Process (TPP) November 14, 2018 stakeholder meetings to discuss economic and policy studies. TANC's primary focus is for the protection of and the maximization of the transfer capability on the California-Oregon Intertie (COI) or Path 66.

TANC is encouraged that the CAISO has initiated additional studies into the disconnect between the historic annual Day-Ahead congestion costs (averaging over \$50 million for the last several years) that occurs on the PACI portion of the COI and the de minimis congestion that is shown in the economic studies performed each year for the TPP. We believe that these additional studies and the CAISO's initial look at the structural differences to be an excellent step in the correct direction. TANC encourages the CAISO to continue looking at the causes of Day-Ahead congestion, both operational and analytically within the TPP modeling, and identify potential mitigation measures to help alleviate the congestion burden on ratepayers. TANC is willing to assist the CAISO in this endeavor, as appropriate.