

**COMMENTS OF THE
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA
ON THE CAISO'S 2013-2014 TRANSMISSION PLANNING PROCESS STUDY RESULTS**

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide comments on the results of the California Independent System Operator's (CAISO) 2013-2014 Transmission Planning Process (TPP) studies as originally posted on the CAISO website on August 15, 2013, and then at the TPP Stakeholder meetings held on September 25 and 26, 2013. TANC's comments focus on the reliability assessment results for the Pacific Gas and Electric Company's (PG&E's) bulk transmission system and on how issues associated with the PG&E bulk system can impact the California-Oregon Transmission Project (COTP) for which TANC is the Project Manager and largest Participant.

TANC's primary concerns regarding these studies are the impacts which the "unavailability" of the remedial actions contracted for by PG&E with the California Department of Water Resources (CDWR) and currently participating in the PG&E remedial action scheme (RAS), would have on the ability to deliver power over the California-Oregon Intertie (COI) of which the COTP is a major component. This RAS participation provides for dropping generation and pump loads of the CDWR associated with various single-line and double-line outages on PG&E's 500-kV transmission network between the Malin and Midway substations. Studies by the CAISO as part of the TPP have indicated that removal of CDWR's participation in the PG&E RAS would reduce the amounts of power that could be delivered over the COI by several hundred megawatts. This adverse impact from loss of CDWR's participation in the PG&E RAS has been discussed with CAISO staff and other interested parties in both the TPP forum and in other proceedings/discussions.

Specifically, the TPP studies have noted a number of issues due to an outage of the Table Mountain-Tesla and Table Mountain-Vaca Dixon (the "Table Mountain-South") 500-kV lines if the CDWR generation at Hyatt and Thermalito is not tripped via RAS and have identified potential mitigation solutions for each. The solutions suggested in the information posted in mid-August for mitigating the noted overloads included upgrading the impacted line, limiting COI transfers, limiting generation in northern California, or modifying other existing RAS to drop generation at other locations. However, the only form of mitigation discussed in any detail during the stakeholder's meetings was limiting COI transfers and no detailed information was presented on the other potential mitigation options. TANC is concerned that "under playing" these other options might lead stakeholders to believe that the only option is to limit COI imports. TANC also is of the opinion that all of the impacts of limiting COI imports have not been adequately studied and is concerned about CAISO statements that limiting COI import capability (by reducing the existing nomograms) does not have impacts on the reliability of the system.

TANC is also unclear as to whether the CDWR pump-drop remedial action was or was not modeled in the TPP studies without the CDWR gen-drop remedial action. In its September 24, 2013 email, CAISO staff informed TANC that the pump-drop RAS was not modeled in the studies; however, in a response to a question from TANC at the September 25, 2013 stakeholder meeting CAISO staff indicated that the pump-drop remedial action was modeled. TANC would appreciate clarification on this modeling question.

In addition, and due to “findings” during recent operational studies, TANC is concerned that the data sets used by the CAISO in the TPP studies may not accurately reflect the ratings of critical lines in northern California (particularly those impacted by the Table Mountain-South outage as discussed above). If such is the case, the potential impacts on COI transfer capability or the need for reinforcements to the transmission grid could well be greater than those identified during the TPP studies. TANC looks forward to discussing this matter (and other areas where the results of the operational and planning studies could be better coordinated) with the CAISO and other pertinent parties over the coming weeks.