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UCOP Comments on the Draft 2018-2019 Transmission Planning Report

The University of California Office of the President (UCOP) appreciates the opportunity to provide comments on the Draft 2018-2019 Transmission Planning report of February 4, 2019 by the California Independent System Operator. As a reminder - The Regents of the University of California is the long-term off-taker of Giffen Solar Park, LLC located in Fresno, California; as such, we manage the contract and have scheduling coordinator responsibility for the solar plant.

An earlier CAISO presentation titled “Economic Planning - Preliminary Production Cost Simulation Results” indicated that the GFFNJCT-GIFFEN 70.0 kV line #1 constraint resulted in 1912 hours of congestion. CAISO noted that the production cost model (PCM) default 50% RPS scenario modeled 55 MW of existing and future solar generation in the Giffen area which are radially connected to the system over this congested line. The congested line is only 5 miles long and the congestion is serious; UCOP previously strongly encouraged CAISO to prioritize exploring low cost opportunities for an economic upgrade to the line. CAISO’s economic planning study highlights that this congestion is not temporary. Unless and until an upgrade or re-rating of the line is implemented, CAISO’s study indicates that this congestion will persist indefinitely.

In the Draft 2018-2019 Transmission Planning report the CAISO studied reconductoring the radial line to the Giffen area to mitigate the curtailment. The CAISO calculated the present value of the reconductoring benefit “to be \$49 million...” Further, the CAISO states in the draft report that “the benefit to cost ratio then is about 7.5, which provides sufficient economic justification for recommending approval for this project.”

A cost benefit ratio of 7.5 is an enormously high value. This ratio makes it self-evident that the PG&E Fresno Giffen area reconductoring project is highly economic and beneficial to CAISO ratepayers. UCOP believes that the PG&E Fresno Giffen area reconductoring should remain in the final TPP report and that the CAISO and PG&E should subsequently take appropriate steps to ensure project completion by no later than start of summer 2019 to mitigate the known curtailment issue in the area.

Respected submitted by:

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