

To whom this concerns at the CAISO,

During the CAISO Transmission Planning stakeholder meeting held at the CAISO on Sept. 25th and 26th, I asked some questions and raised some concerns related to the potential that by the end of 2014 the contractual obligation between CDWR and PG&E that in part supports a portion of the Remedial Action Scheme for imported power across the WECC Path 66 (California/Oregon Intertie - COI) will no longer be in effect. Having a lower magnitude of remedial action, such as the dropping of certain generation after certain transmission outages, can directly impact the amount of power that can be imported across Path 66 coincident with the level of Northern California Hydro generation.

My concern voiced during the stakeholder meeting is that progress towards a resolution to the situation outlined above is going too slowly. Although the CAISO has taken the lead in defining operation impacts, the associated transmission planning impacts included with Irina Green's presentation were not specifically defined and explained such that it was clear what the problem is, what are the potential solutions and what is the path being followed to reach an equitable solution in a timely manner. The information presented by Irina did not seem to correspond with the analysis being conducted by CAISO Operations Engineering nor include the amount and detail of analysis as CAISO Operations. Granted that planning and operations look at different points in time, but planning does feed directly into operations and what is seen in operations does need to be addressed in planning. When will coordination between the two take place? What is the schedule for resolution of the Path 66 related remedial actions? It needs to be concluded sufficiently prior to the end of 2014 such that it can be implemented by that time. It needs to be pursued quicker such that all potentially affected parties are involved correctly in reaching an equitable solution agreeable to all.

The technical analysis done to date tends to show that not only will the ability to utilize Path 66 be limited without the existing amount of remedial actions, but also the Path 66 rating that was established through WECC. To my knowledge, the Path 66 rating is based on a certain amount of remedial actions and that this was established as the rating was increased from 2400 to 2800 to 3200 and with the COTP 500 kV line, to its present rating of 4800 MW. When will this be addressed and if so will it be a WECC wide assessment as required for impacts to a WECC established Path Rating?

Another point made concerned the nomograms Irina presented that included various nomogram lines corresponding to COI flow and Northern Calif. Hydro generation. The nomograms included mention of the Colusa and Hatchet Ridge generating plants. Is it correct that the operation of these plants will not result in a reduction of COI availability to those entities not directly associated with the CAISO such as the Western Area Power Admin? The nomograms should be revised so that this is not implied.

On another note, Irina also presented a couple of potential reliability problems that should be restated as only verification of existing limits. One concerned the Olinda 500/230 kV transformer bank overloading. This potential overload is directly caused by the Colusa Power Plant and there is a Special Protection System (SPS) in place and in operation that will prevent the bank from overloading. If still included in the CAISO transmission assessment report, it should include that this is only a sensitivity to verify that the SPS is still needed. Another point of concern was showing that the Captain Jack-Olinda 500 kV line could load to 100% of its emergency rating upon an outage of both Malin-Round Mt. 500 kV lines when in fact this demonstration was with Path 66 (COI) at 4800 MW and Northern California hydro generation higher than limited in current operation nomograms used by the CAISO. This should be removed and not included in the CAISO transmission assessment report as it is too limited in technical scope to infer a verification of the Path 66 rating and associated transmission limitation.

Thank you for considering my comments.

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