



January 9, 2003

Attn: Commission's Docket Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: Docket # I.00-11-001, Prehearing Conference Statement of the California  
Independent System Operator

Dear Clerk:

Enclosed for filing please find an original and eight copies of the Prehearing Conference Statement of the California Independent System Operator Corporation in Docket # I.00-11-001. Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé  
Regulatory Counsel

Cc: Attached Service List

**PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation into )  
implementation of Assembly Bill 970 regarding ) I.00-11-001  
the identification of electric transmission and )  
distribution constraints, actions to resolve those )  
constraints, and related matters affecting the )  
reliability of electric supply. )  
\_\_\_\_\_ )

**PREHEARING CONFERENCE STATEMENT  
OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

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Dated: January 9, 2003

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OF THE STATE OF CALIFORNIA**

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**PREHEARING CONFERENCE STATEMENT  
OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

In accordance with the Administrative Law Judge’s (“ALJ”) December 20, 2003 Ruling: Notice of Further Prehearing Conference (“December 20 Notice”), the California Independent System Operator (“CA ISO”) respectfully submits this prehearing conference (“PHC”) statement. The December 20 Notice asks the CA ISO to report in its PHC statement on the status of its development of a methodology to assess the economic value of proposed transmission facilities (“economic methodology”)(as applied to Path 26). In addition, the December 20 Notice indicates that the California Public Utilities Commission (“CPUC” or “Commission”) will, in 2003, develop a comprehensive transmission plan for renewable electric generation facilities. A January 2, 2003 ALJ Ruling Regarding Proposed Schedule for Developing Renewables Transmission Plan Per SB 1038 elaborates on this objective and indicates initial ideas on coordination between the CPUC and the California Energy Commission (“CEC”) as the CEC must develop a comprehensive renewable electricity generation resource plan. This PHC statement provides the status of the development of an economic methodology and ideas on coordinating the CPUC’s development of a transmission plan for renewables with the CA ISO’s transmission planning process in order to minimize a duplication of efforts.

**I. Status of the Development of an Economic Methodology.**

The CA ISO last updated the CPUC on the status of its efforts to develop an economic

methodology on August 16, 2002. At that time, the CA ISO explained to the CPUC that its efforts to develop, with the input of key California agencies and the Participating Transmission Owners (“PTOs”), an economic methodology had been delayed and that it estimated that the methodology would be finalized in three months and applied to Path 26 in six months. Since that update, the CA ISO’s Department of Market Analysis (“DMA”) has invested substantial efforts in working with London Economics (“LE”), the consultant retained to develop the methodology, to revise the methodology initially proposed by LE to address concerns identified by DMA and the CA ISO Market Surveillance Committee (“MSC”).

This effort has involved revising the methodology itself and, concurrently, testing the revisions and refinements using Path 26 as a test case example. The CA ISO expects that by the end of February, there will be a document summarizing the components of a recommended methodology to assess the economic benefits of transmission additions, along with an initial attempt to test the methodology with some illustrative information from application of the methodology to an upgrade of Path 26. A comprehensive assessment of a Path 26 upgrade will not be available by the end of February due to concerns about the capability of the current modeling software (POOLMOD) to accurately model the Western Interconnection (described in further detail below), and insufficient time to run an adequate number of scenarios.

As part of the work that has been undertaken jointly between DMA and LE, one significant problem that has been identified is limitations of POOLMOD, the model used by LE to prepare the illustrative information. POOLMOD includes only a simplistic and limited network representation. Thus, while the capabilities of POOLMOD have been sufficient for purposes of initial testing of the methodology, the CA ISO is concerned that the model is unlikely to be sufficiently detailed to generate credible results in an actual case study. The CA ISO expects, as a further step in the development of an economic methodology, to obtain a more sophisticated full network model of the Western Interconnection transmission system.

The limitations of POOLMOD raise important questions about the appropriate further steps to be taken upon the documentation of an economic methodology at the end of February.

The CA ISO could undertake further sensitivity cases, using an upgrade of Path 26 as an example, to further validate the methodology, and then turn to procurement of a sufficiently detailed model. The CA ISO could immediately turn to the task of procuring a more sophisticated network model, and conduct any further assessments and refinements using the more sophisticated model.<sup>1</sup> In fact, the CA ISO considers that the methodology will continue to be refined and improved over time as the CA ISO and other relevant players gain experience applying it to particular cases relevant to them. The CA ISO has not had an opportunity to determine which of these alternatives is the best course of action, and may not be able to responsibly make the determination until the expected further analysis is available at the end of February.

The CA ISO notes moreover that because of the implementation of low cost, high impact improvements to Path 26<sup>2</sup>, and the development of significant additional generation in California, there may be higher priority potential transmission upgrades that would merit a thorough economic assessment, than an upgrade of Path 26. It may be that the most important initial task upon procurement of a full network model, will be the identification of the highest priority projects meriting a thorough economic assessment. One potential candidate could be a second connection between Southern California and Arizona.

The CA ISO will continue to keep the CPUC formally apprised of the progress of its efforts (the CPUC is a member of the steering committee that is assisting the CA ISO in the management of the economic methodology development effort and is thus regularly updated through its participation on the steering committee of the status of the efforts). For example, the CA ISO will file with the CPUC and provide to parties on the service list the summary of the

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<sup>1</sup> Theoretically, the CA ISO could also undertake additional sensitivity work as to a Path 26 upgrade using POOLMOD in an attempt to develop a sufficiently thorough assessment to provide the basis for a recommendation to its Governing Board as to upgrading Path 26. This could only be done, however, if the outstanding work demonstrates that reliable results are possible using a sufficient number of POOLMOD cases, which to date does not appear to be the case.

<sup>2</sup> For example, the implementation of a maintenance Special Protection System (“SPS”) has resulted in the ability of the CA ISO to operate Path 26 to a higher level. These and other low cost improvements have allowed the CA ISO to operate the Path 26 to a level in the order of 400 MW higher in 2002, than it was able to operate the path in 2001.

methodology and the illustrative test cases regarding an upgrade to Path 26 when they have been finalized. At this time, however, the CA ISO sees no particular value in going forward with evidentiary hearings on the economic methodology. The current methodology is a work-in-progress and it is uncertain what the benefit would be of evidentiary hearings regarding the work that has been undertaken to date. In any event, the CA ISO will attend the PHC and will be prepared discuss scheduling in light of this update.

## **II. Renewables Transmission Plan.**

In addition, the December 20 Notice indicates that the CPUC will, in 2003, develop a comprehensive transmission plan for renewable electric generation facilities. A January 2, 2003 ALJ Ruling Regarding Proposed Schedule for Developing Renewables Transmission Plan Per SB 1038 elaborates on this objective and indicates initial ideas on coordination between the CPUC and the CEC, as the CEC must develop a corresponding comprehensive renewable electricity generation resource plan.

As set forth in the December 20 Notice, the effort to develop a comprehensive transmission plan for renewable electric generation facilities stems from Public Utilities Code section 383.6, which directs the Commission to prepare and submit such a plan to the Legislature. Section 383.6 directs the CPUC to consult with the CEC, the CA ISO and electrical corporations in the development of and preparation of the plan.

Consistent with the directive that the CPUC consult with the CA ISO and electrical corporations, the CA ISO considers that, in addition to seeking to coordinate with the CEC, the CPUC should also coordinate its efforts with the CA ISO's annual grid planning process. This will help reduce a duplication of efforts and minimize the likelihood of inconsistent results.

The CA ISO's grid planning process requires the Participating Transmission Owners ("PTOs") to annually prepare a transmission expansion plan covering a minimum five-year planning horizon for its service area. See CA ISO Tariff section 3.2.2.1. While the primary focus of the annual transmission expansion plans is a five year planning horizon, the CA ISO also requests the PTOs to look beyond a five year planning horizon in order to capture long-lead

time facilities. To provide all Market Participants an opportunity to provide their input into the expansion planning process, the PTO plans are developed in a stakeholder process, in which the CPUC and the CEC can participate. The plans are reviewed by the CA ISO, subject to comments by the CA ISO and stakeholders, and ultimately approved by the CA ISO, with significant projects (above \$20 million) presented to the CA ISO Governing Board for its approval. Once the expansion plans have been prepared, the CA ISO undertakes another stakeholder process to assess the full CA ISO controlled transmission grid by combining the expansion plans from all of the PTOs. The recommendations resulting from this assessment address the transmission needs of the CA ISO controlled transmission grid, from a statewide perspective.

The expansion plans take almost a year to prepare. The PTOs generally develop study plans (which are subject to stakeholder comments) and base cases in late spring (March/April/May). This process is followed by studies conducted during the summer and early fall. Reports are then prepared which document the results of the technical studies and set forth recommendations for needed additions to maintain reliability. The study results and the reports are subjected to intensive review by the CA ISO and stakeholders before they are finalized. The CA ISO typically presents its findings and recommendations to the CA ISO Governing Board sometime during the first three months of the following year.

To avoid a duplication of efforts, the CA ISO considers that the renewables plan should build on the plans and reports that are developed by the PTOs in the CA ISO transmission expansion planning process. In particular, the objectives of the renewables plan can be captured in the study plans for the annual expansion plans and additional studies can be performed over the course of the expansion planning process to identify the upgrades needed to accommodate renewables, based on inputs from the CEC and the CPUC as to expected/recommended renewable generation additions. To further this objective, CA ISO would very much welcome input from the CEC and the CPUC in the process of reviewing proposed PTO study plans, studies and recommendations. In this manner, the planning exercises of the CPUC and the CA

ISO can be coordinated, use consistent baselines and assumptions, and the additional transmission resources needed to accommodate renewable resources can be clearly identified. Timing will have to be coordinated to ensure that the CPUC can undertake the process it requires to complete its plan and submit it in a timely fashion to the Legislature. Fortunately, however, ALJ's January 2 Ruling indicates that the CPUC had already envisioned undertaking the bulk of the transmission planning work in the summer (when such work takes place in the ISO coordinated planning process) in order to allow the CEC to develop a draft resource assessment plan in the first half of the year.

In sum, the development of a renewables transmission plan should build on the comprehensive transmission planning efforts that are already undertaken by the PTOs in the context of the CA ISO planning process to avoid a duplication of efforts.

January 9, 2003

Respectfully Submitted:

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PROOF OF SERVICE

I hereby certify that on January 9, 2003, I served by electronic and U.S. mail, the Prehearing Conference Statement of the California Independent System Operator in Docket # I. 00-11-001.  
DATED at Folsom, California on January 9, 2003.

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Cayden Mohr  
An Employee of the California  
Independent System Operator