

**AMP Comments on the CAISO 2012-13 Transmission Plan:  
 CAISO Preliminary Study Results and PTO’s Proposed Solutions**

Alameda Municipal Power (AMP) appreciates the opportunity to comment during the development of the CAISO 2012-13 Transmission Plan. The comments and questions below address the studies posted on the ISO’s website on August 15, 2012 and discussed during the September 26<sup>th</sup>-27<sup>th</sup> Stakeholder meetings.

The CAISO assessment identifies a Category C thermal overload on Moraga to Oakland J 115kV beginning in 2017. See Table 1 below. We are under the impression that the CAISO had approved PG&E’s *Moraga-Oakland “J” SPS* project in the 2009-10 transmission plan in part to mitigate this issue. We request the CAISO/PG&E to provide an update on the implementation of this project. In addition PG&E had submitted the *Moraga-San Leandro and Moraga-Oakland J 115kV Reconductor* projects in the 2010 Request Window, but our understanding is that the project was not approved. Subsequently, the CAISO approved the *East Shore - Oakland “J” 115 kV Reconductor* project in 2011-12 Transmission Plan. Presumably, this approved project and the *Moraga-Oakland “J” SPS* projects were modeled in the 2012-13 assessment base cases.

**Table 1: Category C Overloads in East Bay**

ID	Overloaded Facility	Worst Contingency	Category	Category Description	Loading (%)			Potential Mitigation Solutions
					2014 Summer Peak	2017 Summer Peak	2022 Summer Peak	
Ebay -SP- T-05	Moraga - Oakland J 115 kV Line	Grant-Oakland J 115 kV Line - San Leandro - Oakland J #1 115kV Line	C3	N-1-1	N/A	102%	107%	Re-rate or reconductor line. Drop load either manually or thru SPS as appropriate

Therefore it is concerning that even with the approval of the two projects mentioned above, this year’s reliability assessment indicates deficiencies. A long-term solution for the Alameda/Oakland area needs to be developed and implemented as soon as possible to address these reliability concerns.. We believe the Oakland/Alameda metropolitan area deserves a level of reliable service at least equal to if not superior to other metropolitan areas.

During the CAISO's September 27th stakeholder meeting, PG&E presented its *Moraga to Potrero 230kV* project entailing the construction of another major transmission line to San Francisco, with this one being a 230 kV AC cable from Moraga to Potrero substation. AMP believes that this project has synergy with the Alternatives 1 and 2 that were proposed by PG&E in 2009 under the Oakland Long Term Plan.<sup>1</sup>

<sup>1</sup> **Oakland Long Term Plan** proposed to add a new *Oakland J – Oakland C 115 kV* Cable (Approximately 5 miles). In order for this facility to interconnect to the 115 kV transmission system in Oakland, several additional projects were identified by PG&E to be needed.

Since Alameda forms a significant portion of the load that must be served in the area, we want to participate in the process that selects the long-term solution. We are currently engaged with PG&E on some operational issues concerning our two systems. We would like to see a separate but related forum developed that would assist the CAISO in selecting the long term transmission solution for the Oakland/Alameda area. We believe that the interests of the area are best served by minimizing the period of reliance on the SPS (that is still being developed ) and encourage the CAISO to welcome and participate in efforts to that end.

AMP appreciates the opportunity to comment on the CAISO 2012-13 Transmission Plan and acknowledges the efforts of the CAISO staff to develop the plan to date.

If you have any questions concerning these comments, please contact Douglas Draeger ([Draeger@alamedamp.com](mailto:Draeger@alamedamp.com)) or Barry Flynn (888-634-7516 and [brflynn@flynnrci.com](mailto:brflynn@flynnrci.com)).