

Alameda Municipal Power Comments on the CAISO Reliability Assessment as part of the 2014-15 Transmission Plan

Alameda Municipal Power (AMP) appreciates the opportunity to comment on the CAISO Reliability Assessment as described in the materials related to and as contained in the stakeholder meetings on September 24 and 25, 2014.

Oakland and Alameda CTs

The CAISO presented two scenarios in the Reliability Assessment for the Oakland combustion turbines (CTs), one case with two units online and a second case with all three units retired/shutdown. The performance of the 115 kV system in the East Bay is dramatically different in the two cases, with many new deficiencies identified without the Oakland CTs. The depth of the issue is being somewhat masked by the modeling of the NCPA Alameda CTs at full operation. Given the limited hours of allowed operation and the restriction to only call upon the Alameda CTs in a system emergency, we recommend any reliance on these CTs in Alameda to be for only very short durations and supported by analysis of the expected hours of operation. For example, reliance on these units to mitigate a normal overload or an overload resulting from a single initiating event would likely lead to excessive operations as they would need to be operated in advance of the event to avoid a SOL violation. Furthermore, the local system must maintain sufficient operational flexibility to accommodate maintenance outages without resulting in excessive use of the CTs.

Given that the system performance is so dramatically different between the two base conditions, it is important to understand which is the base case that will be used in system planning. The power system models posted on the website have the Oakland CTs shutdown. At the stakeholder meeting it was identified that the reason for this modeling assumption was the directive in the CPUC LTPP to not rely on generating units greater than 40 years old in developing long-term reliability plans. However, it was also identified in the stakeholder meeting that the CAISO usually waits until there is an announcement by the owner concerning retirement before assuming a retirement. Therefore, it is unclear what the planning assumption is made for the Oakland CTs. Given their importance to reliability and also that they are the only remaining RMR units (aside from the Huntington Beach synchronous condensers), BAMx recommends the development of a transmission plan that supports the eventual operation of the system without these units. Once such a plan is understood, the timing of the plan along with the future reliance on these generators can be better understood.

Modeling of Russell City Contingencies

Though the issue was commented upon in the 2013-2014 TPP, Russell City continues to be modeled in the contingency analysis as separate outages of each of the three generating units. As this is a combined cycle power plant, the CAISO Planning Standards require that the loss of all the units be considered as a *G-I*. Revision of the modeling results in increased contingency flows and reliability deficiencies between Moraga and San Leandro Station U even after the completion of the *East Shore-Oakland J Reconductoring Project*. BAMx requests that the modeling of Russell City contingencies be corrected and the assessment results be updated in the Final Assessment.

Need to Develop a Long-Term Plan for the East Bay

In addition to the above concerns about both the northern and southern portions of the Oakland 115 kV system, there are Special Protection Schemes at both Station J and Station C that drop load in the East Bay.¹ With the recent changes in the CAISO's Planning Standards, utilizing SPS to drop load in this urban area is not an acceptable long-term mitigation for either category B or C contingencies. Given this change and the issues described above, BAMx recommends that the next planning cycle include an in-depth review of the East Bay transmission system and the development of a long-term plan that meets the new CAISO Planning Standards as well as identifies a long-term plan to phase out the reliance on the Oakland CTs.

AMP Supports BAMx Comments

AMP fully supports the BAMx comments.

AMP appreciates the opportunity to comment on the CAISO Draft 2013-14 Transmission Plan.

If you have any questions concerning these comments, please contact Barry Flynn (888-634-7516 and brflynn@flynnrci.com), or Lindsay Battenberg (510-814-6412 and battenberg@alamedamp.com)

¹ Neither of these SPSs are identified in the review of SPS (Table 3.3-1: Summary of recommendations for each SPS) in the 2013-14 Transmission Plan.