

March 3, 2016

VIA EMAIL ONLY: regionaltransmission@caiso.com

CAISO
250 Outcropping Way
Folsom, CA 95630

RE: Comments on the 2015-2016 CAISO Transmission Planning Process Stakeholder Meeting of February 18, 2016

To Whom it may concern:

AltaGas appreciates the opportunity to comment on the ISO presentation during its February 18, 2016 Stakeholder meeting discussing the 2015-2016 Transmission Plan results and recommendations. We fully understand and appreciate the CAISO's efforts, along with the support and input of the three IOUs and other stakeholders, to a very complex process.

AltaGas comments are specific to analysis of the Southern California (SCE) Eastern system. The comments are as follows:

1. AltaGas had the opportunity to participate in the ISO's September 21-22, 2015 Stakeholder meeting in which the 2015-2016 Transmission Plan preliminary Reliability assessment results were discussed. This presentation was very well done by the ISO staff. AltaGas was specifically interested in the evaluation of SCE's Eastern bulk system and noted existing problems in this area including thermal overloading, voltage violations under light load conditions, and dynamic issues under double contingencies as well as N-1-1 contingencies. In particular, the Julian Hinds – Mirage 230 kV line was a major bottleneck that would overload under a variety of contingencies.

The current 2015-2016 draft Transmission Plan and Appendix C (Reliability Assessment Results) do not mention even once the overload of J.Hinds – Mirage line. Is this line not overloaded if you lose the J.Hinds – Eagle Mountain line or if you lose the Red Bluff – Devers #1 and #2 lines? This overload was identified in September 21-22, 2015 presentation. What has changed?

2. In Appendix C, SCE Eastern Area results, AltaGas does not see the results for some single contingencies that are likely to cause overloads. For example, an analysis of the 2017 Summer Peak case (from CAISO portal) shows the J.Hinds – Mirage overloads to 117% for a loss of the Palo Verde – Col River 500 kV line. Is this result correct?
3. What are the consequences of a loss of both Red Bluff – Devers #1 and #2 500 kV lines? Any overloads? Voltage issues? Stability problems? Potential mitigation? The CAISO notes that there are existing issues associated with JH-Mirage overloading for the Devers-Red Bluff N-2 condition and highlighted them in the Buck Blvd. Generation Tie Loop-in Project study presentation in a September 22, 2015 TPP stakeholder meeting. These don't seem to be identified in the draft 2015/2016 plan presented in February.

4. In the Buck Blvd. Generation Tie Loop-in Project study and presentation of September 21-22, 2015, Stakeholder meeting, the CAISO identified a potential SPS guideline violation associated with the Devers-Red Bluff N-2 contingency in both the pre-project and post-project policy cases. The 2015/2016 draft transmission plan does not make mention of the N-2 issues identified in the Sept 2015 presentation. If the reliability issue exists – as identified by the CAISO in September, would one expect to see it addressed in the final draft plan as well?
5. Analysis for numerous N-1-1 contingencies appear to be missing. For example, loss of J.Hinds – Eagle Mountain followed by Loss of Palo Verde – Col River. What are the results?
6. Analysis for some bus faults appears to be missing. For example, loss of 230 kV tie breaker at Julian Hinds that opens up the connection between SCE and MWD. What are the results of this contingency?
7. In the past several years, J.Hinds – Mirage 230 kV circuit was considered as a “congested path” with some cost associated with congestion. In 2015-2016 Transmission Plan, there is no mention of any congestion cost related to J.Hinds – Mirage. Congestion data from the CAISO OASIS indicates that in 2013 and 2014, the line indicated congestion nearly 100 hours for each year, and greater than 500 hours in 2012. Is this circuit no longer a congested path?
8. The CAISO notes that the current JH (SCE and MWD) and Eagle Mountain voltage issues and the JH-Mirage overloads are mitigated with various operating procedures, SPS, and soon to add more shunt reactors. Note that these mitigations can and are, at times, at the expense of the AltaGas’ generation facility and threaten revenue.
9. Per Tariff Section 24.3.4.1, there is a whole list of criteria that the CAISO is supposed to use to determine whether or not to conduct an economic planning study. Rather than review the request according to that criteria, the draft plan simply states that the project “has not been found to be needed at this time.” P. 124. 296.
10. Tariff Section 24.3.4.1 also provides for stakeholders to submit their own economic studies to support a transmission line. AltaGas did so, and the study supports inclusion of the project in the Transmission Plan. Also, I understand that the CAISO has effectively conceded that AltaGas has demonstrated the economic benefits of the project. Therefore, the CAISO should consider inclusion of the project in the Plan, per Tariff Section 24.4.6.7. Simply stating it’s “not needed” doesn’t seem to be a sufficient analysis.

Again, AltaGas thanks the CAISO for the opportunity to make these comments and looks forward to continued discussions.

Sincerely,



Christopher J. Doyle
Vice President