

**California Department of Water Resources - State Water Project Comments
to California Independent System Operator for the
2012/2013 Transmission Planning Process Stakeholder Meeting
December 11-12, 2012**

California Department of Water Resources - State Water Project (CDWR) welcomes the opportunity to provide comments regarding the 2012/2013 California Independent System Operator (CAISO) Transmission Planning Process and stakeholder meetings held December 11 and 12, 2012. CDWR acknowledges the significant work CAISO has undertaken to engage stakeholders at each stage and development of the plan thus far.

CDWR believes the planning process; including inputs, studies, and results; needs to be consistent with the guiding principles of transparency, stakeholder participation, and clarity and appreciates CAISO's attempt to apply these principles in the current planning process. CDWR also supports CAISO's efforts to improve grid reliability through consideration of both physical transmission and transmission alternatives, such as Special Protection Schemes/ Remedial Action Schemes (SPS/RAS), in certain cases. With either alternative, CAISO should evaluate the short-term and long-term impacts to the affected systems, entities, and paths in order to assess and inform stakeholders of the benefits of each alternative. Also, in consideration of transmission alternatives, CAISO should explore compensation mechanisms to support such alternatives.

During the December stakeholder meeting presentation for the Policy Driven Power flow and Stability Study for the PG&E Area Bulk System, CAISO staff identified concerns with overload of the Table Mountain 500/230 kV transformer in the results of the 2022 Off-Peak Load, High DG portfolio scenario. CDWR requests clarification as to what CAISO has identified are the major contributing causes, pre-contingency, of this potential overload. Since the proposed mitigation for Categories B and C includes tripping of generation at CDWR's Hyatt facility (via SPS) or reducing the Table Mountain 500/230 kV transformer flow, CDWR requests confirmation from CAISO that this Category B, T-1 scenario shown on slide 45 of the presentation is not intended to be part of the *existing* SPS indicated on slide 46.

If CAISO has assumed that part of the *existing* SPS is to trip Hyatt and Thermalito facilities, then CDWR believes this assumption has been incorrectly applied. If CAISO has identified this potential mitigation as needed in addition to the *existing* SPS whether for short-term or long-term reliability, CDWR requests CAISO explain how implementation of this additional scheme could be properly compensated.

Please contact John Yarbrough (916-574-0665 and johnny@water.ca.gov) or Aseem Bhatia (916-574-0674 and abhatia@water.ca.gov) with any questions.