

## **CEERT, RNW, NRDC and NWEAC Comments on the Preliminary Results of the Information Study on Increased Capabilities for Transfers of Low Carbon Electricity between the Pacific Northwest and California**

The Center for Energy Efficiency and Renewable Technologies (CEERT), Renewable Northwest (RNW), the National Resources Defense Council (NRDC) and the NW Energy Coalition (NWEAC) appreciate the opportunity to comment on the preliminary results of the California Independent System Operator (CAISO) 2018-19 Transmission Planning Process (TPP) Information Study on Increased Capabilities for Transfers of Low Carbon Electricity between the Pacific Northwest and California. The information was a valuable first step to further integration between the Pacific Northwest and California in order to reduce costs and emissions in both regions. CEERT, RNW, NRDC, NWEAC are particularly supportive of ongoing collaboration between the CAISO and entities in the Pacific Northwest, including the Northwest Power and Conservation Council, the Bonneville Power Administration and others on integrating better modelling tools to represent the NW hydro system and encourage this effort to continue after the conclusion of the 2018-19 TPP.

In the initial letter asking CAISO to perform the Informational Study, the primary purpose indicated was to investigate the role of increased transfer capacities in the phase out of Aliso Canyon natural gas storage facility and reducing gas burn in the LA Basin.<sup>1</sup> While CEERT, RNW, NRDC and NWEAC see the analysis completed thus far as an important first step, an analysis on impacts to local capacity requirements in the LA Basin and on natural gas needs in California and in the LA Basin is needed to fulfill the purpose of the study. The LA Basin is essentially a single load pocket, even though it is operated by two balancing authorities and thus should be evaluated as a single physical system.

CEERT, RNW, NRDC, and NWEAC seek clarification on whether Most Severe Single Contingency (MSSC) was studied. In the Study Scope, “potential change in [MSSC] and its impact on system planning and operation” was listed as an analysis for increasing capacities on the PDCI.<sup>2</sup> The PDCI is not normally the current MSSC for CAISO, Los Angeles Department of Water and Power, or Bonneville Power Administration, but in the future it will likely be with events like retirement of Diablo Canyon Power Plant, closure of the IPP coal plant, and changes in dispatch in the Pacific Northwest.

CEERT, RNW, NRDC, and NWEAC urge that the foundational methodology development in this Informational Study is continued into the 2019-20 TPP with both physical infrastructure and upgrades. The Swan Lake pumped hydro project could provide extensive flexibility between the two regions. A physical upgrade to the PDCI to improve transfer capabilities should be studied, given that the modest increases in transfers studied in this round appear to have benefits.

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<sup>1</sup> Re: Request for Sensitivity Case in the California Independent System Operator 2018- 2019 Transmission Planning Process – Increased Capabilities for Transfers of Low Carbon Electricity between the Pacific Northwest and California. <http://www.caiso.com/Documents/CPUCandCECLettertoISO-Feb152018.pdf>

<sup>2</sup> Study Scope pg 12

Finally, a continuation of this study should tie together with the follow on work for the Malin Study.<sup>3</sup> Particularly, the impact of loop flow and the potential advantages of projects like the SWIP N transmission line on capacity on the PDCI and AC intertie.

Given the interregional nature of the Informational Study, CEERT, RNW, NRDC, and NWECC hope promising projects can then be submitted into the interregional process. Projects that enable increased coordination between California and the Pacific Northwest are prime examples of the types of projects intended for study in the interregional process, which can insure a full view of benefits and implications for each region.

Signed,

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<sup>3</sup> Preliminary Policy and Economics Assessments, 2018-19 Transmission Planning Process Stakeholder Meeting November 16, 2018 at slide 102