

Comments of the California Large Energy Consumers Association
on the 2013-2014 ISO Transmission Plan

The California Large Energy Consumers Association (CLECA) provides these limited comments on the ISO's draft final 2013-2014 Transmission Plan. CLECA's comments focus on the Plan's discussion of its analysis of non-conventional alternatives to meet local area needs that otherwise would require new transmission or conventional generation infrastructure. The Plan indicates that in the future the ISO will perform a more comprehensive assessment of non-conventional alternatives, which we strongly support. However, for this Plan, the ISO looked at a subset of alternatives provided by SCE and added scenario assumptions for SDG&E.

CLECA applauds SCE for the provision of alternative scenarios for non-conventional resources and the ISO for running some of these, although the criteria for the ISO's selection of the subset of alternatives chosen are unclear. However, several areas warrant clarification and greater transparency.

First, how did the ISO identify the "performance attributes needed from these alternatives" (p. 27) and, second, what were these performance attributes? Third, how did the ISO select "the input data that aligned with the ISO's view of the necessary performance attributes" (Ibid. and also p. 99.) Fourth, how was this selection process performed? Finally, how did this affect the ISO's choice of three of the SCE scenarios for analysis? Since the ISO has indicated that it will pursue more of this type of analysis in the 2014-2015 Transmission Planning Process, these are important considerations for a transparent process.

Reviewing the scenarios studies by the ISO as presented in page 100 of the Plan, it appears that they did not include demand response (DR) in Orange County or North LA. However, several pages in the related February 12 presentation (pp. 17-22) do include some DR and some scenarios appear to include incremental DR. Thus, the Plan is unclear as to how DR was modeled and what performance attributes it was given. There should be much more clarity about the modeling of DR for the 2014-2015 TPP.

In addition, there should be a coordinated effort among the ISO, CPUC, and CEC to assure that any load forecast used for the relevant study period includes projected load shape changes; such changes are anticipated to occur as a result of the transition of all non-residential IOU customers to time-of-use rates with dynamic pricing options. In addition, starting in 2018, there may be a transition to default time-of-use rates for the residential class. A sensitivity analysis as to the possible impact of the residential rate design change could be very useful, since residential and commercial load are the most temperature sensitive.