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California ISO
250 Outcropping Way
Folsom, CA 95630

Re: Stakeholder comments on ISO preliminary reliability results and PTO mitigation solutions

Dear California ISO,

CalPeak Power, LLC ("CalPeak") respectfully submits the following comments to the California ISO ("CAISO") for consideration in the current Transmission Planning Process ("TPP"). CalPeak Power strongly encourages CAISO's immediate approval of San Diego Gas & Electric's ("SDG&E") "Preferred Scope" Metro Area 69kV Rebuild Project # P12XYZ and suggests changing the In Service Date ("ISD") from "2017/2022" to "ASAP". CalPeak supports this project because of the ongoing dispatch limitations placed upon the three Border-area generation resources:

- CalPeak Power – Border LLC, CalPeak Power Border Unit 1, BORDER_6_UNITA1, 48.98 MW (Pmax)
- Wildflower Energy LP, Larkspur Peaker Unit 1, LARKSP_6_UNIT 1, 46.1 MW (Pmax)
- Wildflower Energy LP, Larkspur Peaker Unit 2, LARKSP_6_UNIT 2, 47.98 MW (Pmax)

SDG&E refers to these resources simply as "Border Gens 1, 2, and 3" in their September 26-27, 2012 presentation materials. These generators represent a trio of critical fast-start, flexible ramping gas-turbine resources with a combined capacity of nearly 150 megawatts. The resources are physically located within the incorporated limits of the City of San Diego. In the unprecedented absence of the San Onofre Nuclear Generating Station ("SONGS") Units 2 and 3, all available existing generation resources in the San Diego sub-area are now required for Local Capacity Requirements ("LCR") per the Addendum to the 2013 Local Capacity Technical Analysis published by CAISO on August 20, 2012.

Given the above mentioned new change in 2013 LCR and continued absence of SONGS units, CalPeak requests the highest possible priority be given to eliminate the current dispatch limitations placed upon the Border-area generation resources. CalPeak also requests that CAISO and SDG&E ensure the full capacity of "Border Gens 1, 2, and 3" is deliverable without any transmission constraint under both NERC Category B and C Contingency since no optional capacity is available for re-dispatch to meet the new LCR requirements.

CalPeak would like to thank CAISO, SDG&E and the other Market Participants for this opportunity to submit its comments for consideration.

If you have any questions, please contact me at the phone numbers below.

Sincerely,

Jeffrey L. Paul, Plant & General Manager
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