

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Sean Neal, 916-498-0121, smn@dwgp.com	Imperial Irrigation District	February 28, 2019

IMPERIAL IRRIGATION DISTRICT

COMMENTS ON THE CAISO'S 2018-2019 TRANSMISSION PLANNING PROCESS

(FEBRUARY 14, 2019 STAKEHOLDER MEETING)

Submitted to: regionaltransmission@caiso.com

Deadline: February 28, 2019

The Imperial Irrigation District (“IID”) thanks the CAISO for the opportunity to provide written comments on the topics presented in the CAISO’s February 14, 2019 stakeholder meeting as part of the 2018-2019 Transmission Planning Process (“TPP”). In these comments, IID responds to the CAISO’s Southern System Local Capacity Area Assessments, particularly with regard to the San Diego-Imperial Valley Area Economic Assessment of S-Line Reactor Transmission Alternative as well as some additional comments regarding geothermal resources. IID reserves the right to comment on any other matter that is part of or becomes part of the 2018-2019 TPP.

With regard to the S-Line Series Reactor Project, the CAISO’s Draft 2018-2019 Transmission Plan issued on February 4, 2019 concludes: “The benefit to cost ratio of this project is encouraging notwithstanding the conservative value assigned to local capacity requirement reductions. The project will be considered in future planning cycles, once the design and configuration of the IID-owned S-Line upgrade is finalized.” Draft Plan at 325. The CAISO’s November 16, 2018 response to IID’s prior comments lists a number of alternative Local Capacity Requirements (“LCR”) reduction options, which are discussed in the February 14 presentation and Draft 2018-2019 Transmission Plan. IID urges the CAISO to continue considering the other identified alternatives, and to share with stakeholders additional details regarding its analyses.

IID would like to propose the further analyses of additional dynamic solutions, such as phase shifting, which would offer greater operational flexibility than a static solution such as the proposed series reactor. As the series reactor analysis is focused on benefits to the CAISO ratepayer, IID would need to assess the project for potential impacts to its area. IID looks forward to working with the CAISO in the further analysis of this proposal as well as the development and evaluation of potential of alternatives. Is the 600MW reduction in the SD-IV area LCR attributed to the reactor project itself or does it include the 213MW LCR reduction previously identified in the 2017-2018 Transmission Plan attributed to the S-line upgrade? In other words, is the S-line upgrade plus the series reactor project reducing the SD-IV LCR by ~800MW? In the 2017-2018 Transmission Plan it was noted that the S-line upgrade plus additional 230:92kV transformation could potentially reduce the LCR in the SD-IV area by 500MW. In that assessment, was an increase in the LA Basin area LCR also identified?

It is noted in section 7.2.1 that Table 7.2-1 reflects a diminution of geothermal resources by 1,197MW going from the Reference System Plan (RSP) to the Hybrid Conforming Plan (HCP). Please inform on potential impacts to the Salton Sea Geothermal region towards both existing and future geothermal resources in the change from RSP to HCP. IID notes the increase HCP renewable capacity to 714MW but the reduction of 5,649GWh less is directly correlated to the reduction of base load geothermal as compared to the RSP. It is further noted that the CAISO has indicated its support of the utilization of geothermal resources located in the Salton Sea Geothermal region.

IID looks forward to further participating in the CAISO's 2018-2019 Transmission Planning Process.