

## CAISO 2014/15 Transmission Study Plan: Stakeholder Comments

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### **Economic Study Request**

LS Power appreciates the opportunity to provide comments on the CAISO 2014/15 Draft Study Plan. LS Power is hereby submitting an economic study request for CAISO to study during the 2014/15 Transmission Plan. The request is to study congestion on California Oregon Intertie, Path 26 and other facilities and evaluate the economic, reliability and renewable integration benefits of the transmission solution proposed below.

CAISO's 2013/14 Transmission planning studies for the Bulk System showed reliability concerns due to loss of major 500 kV line in Northern California, such as loss of Table Mountain-Tesla 500 kV or Table Mountain-Vaca Dixon 500 kV lines. The suggested solutions included upgrading the impacted line or limiting California-Oregon Intertie (COI) transfers thereby limiting the amount of generation into northern California. CAISO should further study this reliability condition and also analyze the economic and reliability impact of any COI curtailments under these contingency conditions. CAISO's recent Market Monitoring reports show a significant amount of congestion on the COI path. LS Power recommends CAISO perform a study in this area and evaluate the benefits of a new 500 kV path from Midpoint 500 kV substation to Eldorado 500 kV substation. This line can potentially be the transmission solution for resolving reliability & congestion issues CAISO has identified. This project should significantly reduce (if not completely avoid) COI curtailments and provide economic, reliability and renewable integration/Energy Imbalance Market benefits to CAISO ratepayers.

This project comprises of three segments: (a) a new 500 kV line from Midpoint to Robinson Summit, (b) a 500 kV line from Robinson Summit to Harry Allen, which recently became operational (the "ON Line") and (c) a new 500 kV line from Harry Allen to Eldorado substations. LS Power's affiliate owns capacity on these three segments that can be dedicated to CAISO creating a complete path from Midpoint to Eldorado. This combined project offers a major parallel path to CAISO's several existing paths such as Pacific DC Intertie (PDCI), Pacific AC Intertie, Path 26 and CAISO's Southwest intertie interfaces and enhances CAISO's renewable integration/Energy Imbalance Market initiatives providing improved access to the systems of NV Energy, PacifiCorp, Bonneville Power Administration and Idaho Power. The project has huge potential in alleviating several intertie constraints that CAISO BAA currently faces. CAISO had performed a study for this path in the 2012/13 Transmission Planning cycle. Since then CAISO's system and assumptions have changed (including PacifiCorp and potentially NV Energy joining the Energy

Imbalance Market) and CAISO has made several modelling enhancements to its economic planning database, but it has not redone this study. In recognition of the potential economic, reliability and renewable integration/Energy Imbalance Market benefits this project could provide to CAISO ratepayers, we recommend CAISO perform the requested detailed study as part of 2014/15 planning cycle. If additional information is required to facilitate the study please contact us.