

Stakeholder Comments

2020-2021 Transmission Planning Process Stakeholder Meeting Sept 23&24, 2020

<i>Submitted by</i>	<i>Company</i>	<i>Date Submitted</i>
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The Northern California Power Agency (NCPA) appreciates the opportunity to provide comments to the CAISO during the 2020-2021 Transmission Planning Process (TPP).

NCPA appreciates the CAISO performing a wildfire mitigation assessment, developing study scenarios based on 2019 PSPS events, and providing preliminary results.

The CAISO's preliminary results provided load drop as a mitigation. While we understand in certain situations, load drop will be the only mitigation, we request the CAISO to consider less impactful solutions as well:

1. Load shed instead of a complete load drop for indirect impacts of transmission level PSPS events.
2. Sectionalizing devices between Tier 1 and Tier 2 High Fire Threat Zones where substations in Tier 1 area could avoid loss of their transmission source.
3. Considering alternatives to addressing the "next worst N-1" such as under-voltage load shedding schemes.
4. Take into account customer counts and the affected area's populations. In certain situations dropping distribution versus transmission load might be less impactful.

We encourage the CAISO to perform an assessment of 2020 PSPS events and potential mitigations, along with performing a wildfire assessment for all future planning cycles as well.