Comments of NGIV2, LLC on November 18, 2019 Stakeholder meeting Economic Analysis Comments for the 2019-2020 Transmission Planning Process ("TPP") December 2, 2019

NGIV2, LLC appreciates the opportunity to provide comments regarding the information provided by CAISO at your November 18, 2019 Stakeholder meeting, specifically related to the draft economic and LCR portions of the 2019-2020 Transmission Planning Process ("TPP"). Without being repetitive, we would like to reiterate our comments related to both the economic and LCR analysis submitted on October 10, 2019. Because of discrepancies noted previously, we would also reiterate our request for additional transparency while conducting the 2019-2020 economic analysis by providing GridView raw output files sooner at the "draft" analysis to assist in identifying data anomalies similar to the error noted previously with PDCI causing congestion on Path 26, or other confirmation of the conclusions.

Economic Analysis Study Plan

There are several assumptions that NGIV2 considers critical to the assessment of the Project that we would like included in CAISO's analysis and they are outlined below.

Accurate NGIV2 Model: Along with the corrected NGIV2 topology model submitted on October 10, 2019, the CAISO should include the associated incremental capacity on Path 46 an additional **1,250MW**, and its associated benefits for relieving constraints, in its economic analysis of the Project. CAISO should also set the binding constraint for Path 46 to **12,450 MW** for the post-NGIV2 economic case.

70% CAISO/30% IID Analysis: For the 2019-2020 Economic Assessment with NGIV2, we request that the analysis include a scenario that assumes 70% participation from a CAISO PTO and a 30% participation from a non-CAISO PTO. **Please refer to the October 10, 2019 comments from the IID**.

Congestion on Path 42: The analysis performed to date for the Scenario 1 and Scenario 2 portfolios show significant congestion on Path 42. With the NGIV2 interconnection to the IID Highline 230kV substation, we believe that the Path 42 congestion can be reduced under N-0 and N-1 conditions. The Highline 230kV station could also be used as an additional injection/delivery point for geothermal generation to help deliver to the CAISO and WestConnect regions.

Conclusion

NGIV2 thanks the CAISO for considering these comments. We look forward to working with CAISO staff on the final 2019-2020 TPP Economic and LCR assessments.