



Comments of Pacific Gas and Electric Company
TPP Proposed Reliability Solution:
Trans Bay Cable Dead Bus Energization and Load Restoration in San Francisco

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the 2012-2013 TPP stakeholder process. PG&E submits these brief comments on Trans Bay Cable’s Dead Bus Energization and Load Restoration in San Francisco reliability solution.

Comments

PG&E supports TBC’s proposed solution, assuming that it is technically feasible, to address a Category D contingency resulting in a citywide blackout in San Francisco. Given the large population and economic importance of San Francisco to California’s economy, it is critical that the city of San Francisco quickly regain power to ensure that vital public services can function in an emergency, and that the region’s economy isn’t harmed by a prolonged blackout.

Given the important and urgent nature of the problem, PG&E urges the ISO to approve both the TBC Dead Bus Energization solution and the Moraga-Potrero solution in the 2012-2013 TPP Planning Cycle. Without additional transmission into the city, such as the proposed Moraga-Potrero solution, the TBC proposed solution is at best a partial interim fix because:

- Re-energization of TBC would only provide enough power to serve less than half of San Francisco’s load while the Category D contingency remains, which could be for a long period;
- It’s unclear how long re-energization of TBC, assuming it is technically feasible, could take without AC reference bus voltage and frequency support from PG&E’s system; and
- The technology proposed by TBC is not yet proven.

Moreover, the two solutions are highly complementary:

- Dead bus start capability for TBC provides an important interim solution to San Francisco’s reliability problem, and PG&E’s proposed Moraga-Potrero solution more comprehensively addresses the reliability problem in the long run.
- AC support from Moraga-Potrero will ensure that TBC can operate at full capacity while the contingency remains.
- When combined with TBC, PG&E’s proposed Moraga-Potrero solution will allow almost all of San Francisco’s load to be served under a Category D contingency.

- Virtually all electric service to the city could be restored within hours once Moraga-Potrero is operational.

In summary, due to the critical and urgent nature of the problem, PG&E urges the ISO to approve both an interim and comprehensive solution to the problem. Moreover, PG&E believes it is imperative that action is taken to approve both solutions in the current cycle of the Transmission Planning Process.