

Port of Oakland and Alameda Municipal Power Comments on the CAISO Draft 2015-16 Transmission Plan

The Port of Oakland and Alameda Municipal Power represent a large portion of the electric load in the East Bay and support a significant portion of the local and regional economy. The Port of Oakland and Alameda Municipal Power are pleased to submit the following joint comments on the CAISO Draft 2015-16 Transmission Plan (Draft Plan). The comments below address the multiple *Draft Transmission Plan* studies, findings, and recommendations included in the Draft Plan dated February 1, 2016 and were subsequently discussed during the February 18th stakeholder meeting.

These comments are motivated by the CAISO's planning methodology and criteria that point to the need to develop a long-term plan for the East Bay. The Port of Oakland and Alameda Municipal Power are encouraged that the CAISO acknowledges that the Draft Plan is relying on aging generation in the East Bay area. In section 2.3.3.5 of the Draft Plan, the CAISO states that unless otherwise noted, they assume that resources retire at the age of 40 years. The Oakland CTs turn 40 years old very soon and no formal announcements have been made by the owners as to the long-term plan for these units. Therefore, the CAISO planning methodology does not support the current assumption that these units are available for the 10-year planning horizon without some further explanation supporting an exception for these units.

In addition, CAISO acknowledges that they do rely on load shedding but only say that they "will consider other alternatives in the long-term horizon." The CAISO planning standards do not allow for continued use of load dropping SPS for single or multiple (old Category C) contingencies in this area. Therefore, to be within the CAISO Planning Standards, there should not be any reliance on load dropping for these contingencies in the long-term. Until this is addressed, the Draft Plan does not conform to the CAISO Planning Standards. The East Bay is a dense urban area, so any solution will require 5-10 years of planning, environmental review, and construction. The Port of Oakland and Alameda Municipal Power urge the CAISO to revise the draft plan to include the development of a plan for the East Bay so this effort can begin immediately.

The Port of Oakland and Alameda Municipal Power appreciate the opportunity to comment on the CAISO Draft 2015-16 Transmission Plan. The Port of Oakland and Alameda Municipal Power would also like to acknowledge the significant effort of the CAISO staff to develop the Draft Plan, as well as the staff's willingness to work with the stakeholders in the process to more fully develop it. We hope to work with the CAISO staff to continue to improve and enhance its capabilities.

If you have any questions concerning these comments, please contact Nicolas Procos at (510) 627-1167 or nprocos@portoakland.com