



October 5, 2015

Mr. Jeff Billinton  
Northern California Planning Manager  
California Independent System Operator  
250 Outcropping Way  
Folsom, CA 95630

**Subject: CAISO 2015/2016 Transmission Planning Process**

Dear Mr Billinton:

The Port of Oakland (Port) exemplifies a unique combination of public/private endeavors. It encompasses a world-class container port, a thriving airport, an array of retail and commercial buildings and acres of recreational and open space. The seaport and airport are 24/7 operations that provide mission critical services to the public and economy that requires a high level of reliability. The Port, through its policies and its tenants' activities, supports approximately 50,000 jobs in the Northern California region and impacts about 827,000 jobs nationwide.

The Port is proud of its role in supporting state and local environmental objectives and has made significant investments in efforts that reduce greenhouse gas and other localized emissions. In particular, the Port has installed infrastructure to support ships plugging into the local electric grid and shutting off their auxiliary engines, otherwise known as shorepower. While the Port is pleased with the results so far, there is much work to be done and at full utilization the Port is anticipating a large increase in demand and electric usage in the seaport area. In addition, the redevelopment of the former Oakland Army Base is progressing and will add significant loads to the area when complete. The Port is eager to partner with state & local agencies and the private sector to meet the Governor's electrification goals, and many of the Port's current efforts incorporate electrification whenever possible.

The Port is preparing an electric master plan for the seaport area, and while the neighboring bulk transmission system is beyond the scope of the electric master plan, the Port's distribution system and the neighboring transmission system are intertwined. Based on the documents provided at the September 21<sup>st</sup> 2015-16 Transmission Planning Process stakeholder meeting, the Port has the following comments and suggestions for inclusion in the scope of the 2016 TPP:

1. The Port is pleased the CAISO is reviewing different scenarios, including the no local generation scenario. In particular, the Dynegy Oakland power plant is of advanced age and is the only generating unit in the state under a Reliability Must Run contract. Continued reliance on these units does not seem practical. The CAISO studies reveal issues on the transmission system in the Oakland area without these and other local generators. The Port supports both wire and non-wire options to address these deficiencies, though all options must take into account many factors, including the Port's commitment to environmental and air quality improvements.

2. The Port is concerned about the overreliance on Special Protection Schemes (SPS) and other mechanisms that contemplate dropping load under certain circumstances. The issues in the East Bay are not new, and the CAISO has adopted new planning standards that phase out the use of SPS in high density urban areas. The Port is eager to see meaningful proposals that will eliminate the reliance on SPS's in the East Bay.
3. The Port is supportive of a detailed East Bay reliability study like the one that was done for the San Francisco Peninsula. The East Bay is susceptible to similar disasters such as earthquakes and is an important economic driver for the Bay Area and the state. It is critical to have a long-term vision of the development of the electric infrastructure in the East Bay. Also as the East Bay is a heavily developed area, such plans should recognize that improvements to the electric system might be a lengthy process. While small incremental improvements may be available to the existing system, such improvements are best viewed as temporary relief while advancing a long-term vision.

The Port and its neighbors have been supporting the buildout of the statewide transmission system for many years by paying the Transmission Access Charge. The Port is eager to see improvements in the East Bay that will improve reliability for the Port and the businesses and residents in the East Bay. The Port is committed to efforts that result in local air quality improvements, promote local job growth, and further the state and Governor's transportation sector electrification goals.

Sincerely



Nicolas Procos  
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cc: Mr. Neil Millar, Executive Director of Infrastructure Development, CAISO  
Mr. John Driscoll, Director of Maritime, Port of Oakland  
Mrs. Kristi McKenney, Acting Director of Aviation, Port of Oakland  
Mr. Bill McLaren, Customer Relationship Manager, Pacific Gas and Electric  
Mr. Marco Rios, Manager of Transmission Planning, Pacific Gas and Electric