

Stakeholder Comments Template

SCE Comments on CAISO November 19 and 20 Transmission Planning Process meetings

Please submit comments to regionaltransmission@caiso.com by Dec 4, 2014

	Company	Date Submitted
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SCE participated in the CAISO’s November 19 and 20 Transmission Planning Process (TPP) meetings and appreciates the opportunity to submit these comments. SCE looks forward to continuing to work with the CAISO during the remainder of the 2014-15 TPP.

I. SCE Supports the CAISO’s Recommendations to Increase Deliverability out of the Imperial Valley Area

SCE commends the CAISO for its detailed analysis to identify solutions that would provide for additional deliverability of renewable generation in the Imperial Valley area. Specifically, SCE supports the following operational measures identified in the CAISO’s presentation to increase deliverability out of the Imperial CREZ by 1,700-1,800 MW:

- By-pass series capacitors on ECO-Miguel 500 kV and ECO-Suncrest 500 kV lines
- Modify IV SPS to include generation tripping following Miguel 500/230 kV transformer N-1 outages
- Rely on 30 min emergency rating of 500/230kV banks at IV and Suncrest

SCE believes these measures will make significant strides in meeting the goal of increasing deliverability from Imperial Valley.

Additionally, SCE supports the CAISO’s preliminary study efforts in assessing transmission projects to increase delivery to ensure the deliverability of the entire portfolio amount in the Imperial Zone, including a scenario that includes an increase of 2,500 MW in the Imperial Zone. The CAISO has performed a spectrum of studies that includes SCE recommended Midway to Devers 500 kV Transmission project and IID’s STEP project. The Midway to Devers project is estimated to be less costly when compared to the STEP project and has a likelihood of successful permitting identified as, “possible but challenging”. SCE supports the CAISO’s analysis and the CEC/Aspen

report and notes the CAISO indicated it is favoring the Midway to Devers project during the stakeholder meetings.

II. Comments Regarding the Harry Allen-EI Dorado Analysis

SCE is continuing to evaluate the additional information regarding the Harry Allen-EI Dorado analysis that was presented at the CAISO's November 19-20 stakeholder meeting. SCE would appreciate the CAISO's response to the following:

1. Slide #10 of the Day 2 Harry Allen-Eldorado presentation says that there have been "Small updates to CT value, dollar year, etc.". SCE requests the CAISO to provide a description of those updates, particularly regarding assumptions relating to the cost of new generation capacity in California, including any differences from what was described in the 2013-14 approved transmission plan.
2. Have any changes been made to the derate assumptions that were described in the CAISO's 2013-14 approved transmission plan? If so, please describe.

SCE observes this is now the second inter-regional project that will result in CAISO allocating all costs to California. We encourage the CAISO to move forward with the Order 1000 inter-regional planning process to ensure inter-regional cost allocation as soon as practical on any similar future projects.

III. CAISO Should Clarify that the Boundary of the LA Basin-San Diego Area is Not Changing

At the November 19, 2014 CAISO stakeholder meeting, on slide 144 of the Day 1 presentation, the "Western LA Basin Sub-area" is expanded to include resources in the Valley sub-area. The "Western LA Basin Sub-area" is defined by the critical contingency of Mesa-Lighthipe 230 kV followed by Mesa-Redondo 230 kV line. SCE requests that the CAISO clarify that this expansion does not alter the boundary of the "LA Basin - San Diego Area" as described in slide 132. The "LA Basin - San Diego Area" is driven by a different critical contingency, the loss of Ocotillo-Suncrest 500 kV followed by ECO - Miguel 500 kV line and therefore the effectiveness of resource locations to address the loss of SDG&E 500 kV lines is not the same as those defined for the "Western LA Basin Sub-area".

IV. SCE Supports the CAISO's Management Recommendation for the approval of the Laguna Bell Corridor Upgrades

During the CAISO stakeholder meeting the CAISO presented a summary of its study and findings on the Laguna Bell Corridor upgrades. As a result of this study the CAISO is recommending the Laguna Bell Corridor upgrade project which is an under \$25 million project. SCE understands that CAISO management plans to formally approve this project in December 2014. SCE supports this CAISO recommendation.