

Regarding the published CAISO 2013-2014 Transmission Planning Process Unified Planning Assumptions and Study Plan, SDG&E has following comments:

1. Page 6, 3.1: Public Policy Objectives section, does not discuss the nuclear backup studies or the risk of an early SONGS retirement in the public policy objectives. This is inconsistent with the treatment of the Sycamore-Penasquitos 230Kv line and the reactive support projects identified in the 2012/2013 ISO TPP process.
2. Page 6-7 3.1.2: Are there concerns that the State RPS goal of 33% will fall short if external renewables procurements are not considered part of the RA deliverables?
3. Page 11, 4.1.3.3: If ISO will be using Benefit Cost Ratio as a driver of identifying the reliability projects (under the CAISO planning standard section), the study plan should outline the methodology and clarify the selection criteria.
4. Page 15, Table 4-2. ISO identified the “seed cases” for SDG&E case building. SDG&E has following recommendations:
 - a) For the 2015 summer peak case ISO specified the 2013 HS2 case. This case could be used, however, the 2015 HS3 case is going to be approved this week and it would be more up to date than the 2013 HS2 case, which was approved back on 11/30/2012.
 - b) ISO listed the 2017 HS1 case which was approved on 10/7/2011 as the one to use for making the 2018 summer peak case. There is a much newer 2018 HS2 case that should be used. This 2018 HS2 case was approved on 7/19/2012.
 - c) ISO listed the 2017 HW2 case as the one to use for making 2018 light summer case, which was approved on 4/26/2012. This is a fairly recent case, however, SDG&E suggest avoid substituting a winter case for a summer case as the winter cases have significantly different flows than summer cases. Instead of the 2017 HW2 case we suggest use the 2018 HS2 case to make the 2018 light summer case. For the same reason, the 2015 summer off-peak case we suggest start with 2015HS3 as well.
 - d) For the 2023 summer peak case ISO specified the 2023 HS1 case and we concur that this is the one which should be used, as it was approved on 10/22/2012.
 - e) Lastly, for the 2023 summer off-peak case ISO specified the 2022 LS1 case, and we concur since the case was approved on 5/23/2012.
5. Page 16, 4.1.9: This section states that using generic dynamic data for modeling planned generation is acceptable. SDG&E notes that most of the dynamic data that is furnished to the generator interconnection (GI) team from generation developers uses proprietary EPCLs. However, the WECC does not allow these EPCLs to be contained in any dynamic data sent to the WECC. This forces SDG&E (and presumably the other PTO's) into the odd position of providing generic data to the WECC case-building process when specific data is available.
6. Page 18, 4.1.10, Transmission Projects: “...The transmission projects that the ISO has approved will be modeled in the study. This includes existing transmission projects that have been in service and future transmission projects that have received ISO approval in the 2012-2013 or

earlier ISO transmission plans...” How do we treat the projects that ISO deemed “needed” but not “recommended for board approval” in the 2012/2013 draft transmission plan”?

7. Page 26, 4.1.19, Power Flow Contingency Analysis: It is not clear in the study plan: 1) if ISO’s outage / contingency list includes the outages of major WECC interties outside of the ISO controlled grid; 2) if ISO contingency processor monitors the neighboring system to identify the impact of the major transmission element outage within ISO controlled grid.
8. Page 30, 4.2.3: Has the ISO considered possible disparities in the cost estimates generated in the TPP vs. the GI process? It may be difficult to have a true apples-to-apples comparison between a TPP project with a detailed cost estimates versus a GI project estimate generated using unit costs.
9. Page A-20/21, Table A1-3 lists existing generation and the unit’s maximum capacity; the values do not match up with the PMAX in our cases for the smaller units. This is probably due to the fact that we use LCR values and these values may be derived from other data, such as NQC. Ocotillo Express is listed in A1 at 299 MW, which matches the PMAX as modeled in PSLF.
10. Page A-25 Table A4-1 Reactive Resources – there’s a typo in the name, and we should have 4-63 cap banks at Penasquitos 230Kv bus.
11. Page A-28: Shouldn’t the list of SDGE SPSs be a bit more inclusive:
 - a. 5.1 230 kV TL23040 OMEC-TJI SPS
 - b. 5.2 230 kV OMEC Gen SPS
 - c. 5.8 CFE SPS
 - d. 5.9 Miguel Bk80/81 SPS
 - e. 5.10 500 kV TL50001 Gen Drop SPS
 - f. 5.11 500 kV TL50003 Gen Drop SPS
 - g. 5.12 500 kV TL50005 Gen Drop SPS
 - h. Path 44 South of SONGS Safety Net
12. Regarding the Generation modeled in the base case scenario, SDG&E urges the ISO to make sure all the bases with and without the SONGS or Encina generation are covered.

Regarding the CAISO Feb 28 Stake Holder meeting, SDG&E has following comments:

1. In discussion with CAISO regarding the study plan for next cycle's reliability assessment, ISO had indicated that both SONGS unit will be modeled and dispatched for the base cases; while one case dispatches a single SONGS unit at 70% output and another case with no SONGS units, to be tested as sensitivities, presumably all as part of reliability analysis. However, in 02/28 stakeholder meeting, CAISO "Unified Planning Assumptions & Study Plan Once Through Cooling/Nuclear Generation Absence Studies" presentation indicated that *"...ISO is considering deferring the updates and refinement to the nuclear generation absence and once-through cooling generation to mid November 2013 through May 2014 time frame in order to Incorporate the CEC's 2013 IEPR demand forecast, including up-to-date information on uncommitted energy efficiency assumptions... If this path is pursued, the updated studies would become separate from the 2013/2014 transmission plan and be released as a separate study"*. SDG&E urges the CAISO to refrain from further delay of the study to address these critical and immediate southern California system concerns as the problem is with us today, and any resulting transmission upgrades are most likely to be long lead time projects. The uncertainty of study assumptions regarding the demand forecast and / or uncommitted energy efficiency can be addressed by analyzing the range of data via a "book-end" approach. With the SONGS licenses up for renewal in 2022/2023 time-frame and the application for a license extension on indefinite hold, SDG&E considers it is more realistic to study a case with no SONGS units as a base case scenario instead of sensitivity in the study year of 2023.
2. On presentation "Unified Planning Assumptions & Study Plan Transmission Planning Process" slide #6, ISO indicated the scope of the 2013/2014 technical study cycle include *"...33% by 2020 renewable resource analysis to identify needed policy-driven elements"*. CAISO's reliability study from last year indicated that the existing transmission in construction / in pipeline is sufficient to fulfill the need for year 2020 RPS?
3. There appears to be too much uncertainty in this study plan: DR Characteristic, Energy Efficiency committed / uncommitted incremental energy savings, OTC, and treatment of SONGS. For example, presentation "Unified Planning Assumptions & Study Plan Transmission Planning Process" slide #13, presentation "Unified Planning Assumptions & Study Plan Reliability Assessment Assumptions & Methodology" slide #18, regarding demand response it was mentioned repeatedly that *"programs that have the appropriate characteristics"* and *"CPUC's expectations for demand response programs"*. What exactly are the referred *"appropriate characteristics"* and *"CPUC's expectations"*? Please clarify.
4. On presentation "Unified Planning Assumptions & Study Plan Reliability Assessment Assumptions & Methodology" slide #14, ISO indicated *"Conventional generation in pre-construction phase with executed LGIA and progressing forward will be modeled off-line but will be available as a non-wire mitigation option"*, then on slide #15 *"New CEC approved resources"* listed Carlsbad and Pio Pico Energy center both as *"Pre construction status"* with the *"first year to be modeled"* in 2016. Does it mean that these units will be modeled, but offline for 2016? Please clarify.

5. On presentation “Unified Planning Assumptions & Study Plan 2013-2014 ISO LCR Studies” slide #4, it indicated that “Units under long-term contract turned on first”. Please provide a list that identifies such units.