

**SVP Comments on the CAISO 2012-13 Transmission Plan:
CAISO Preliminary Study Results and PTO's Proposed Solutions**

City of Santa Clara, dba Silicon Valley Power Silicon Valley Power (SVP) appreciates the opportunity to comment during the development of the CAISO 2012-13 Transmission Plan. The comments and questions below address the studies posted on the ISO's website on August 15, 2012 and discussed during the September 26th-27th Stakeholder meetings.

At the September 27th CAISO Stakeholder's Meeting, PG&E presented a proposal for a project named *NRS-Scott No. 1 115 kV Line Reconductoring*. SVP strongly supports this project.

This circuit is one of the two circuits of the approximately two mile double circuit line 115 kV that terminates at Silicon Valley Power's Northern Receiving Station (NRS) and Scott Receiving Station (SRS). The CAISO's Annual Assessment indicates *Category B* loading violations for multiple single contingencies beginning in 2014. Additionally SVP has identified *Category C* contingencies that result in heavy overloads on this line that were not identified in the annual assessment.¹ Such *Category C* contingency violations lend further support for the need to upgrade this facility.

This line has already been reconducted in 2005 with 477 ACSS conductor. As such, installing a higher capacity conductor may involve significant tower work. Additionally this line transverses a congested urban area and crosses Highway 101. Given the continued increase in line loading that has resulted in the need for new reinforcements so soon following the completion of the last upgrade and the challenging conditions surrounding this line, SVP highly recommends that the No. 2 circuit be upgraded at this time as well.

Given the overloads identified in the 2014 CAISO base case associated with this line, SVP recommends that the operative date for these upgrades be advanced to Summer 2014.

Lastly, SVP has been working with PG&E concerning potential improvements to the SVP transmission facilities in this area. We look forward to continued cooperation with both PG&E and the CAISO in coordinating the upgrades to both systems.

SVP appreciates the opportunity to comment on the CAISO 2012-13 Transmission Plan and acknowledges the significant effort of the CAISO staff to develop the plan so far.

If you have any questions concerning these comments, please contact Robert Jenkins (415-926-1530 and robertjenkins@flynnrci.com), or Orville Plum (408-261-5470 and OPlum@santaclaraca.gov)

¹ The most severe of these Category C overloads is the overlapping loss of the Los Esetros - Nortech 115 kV (branch 35658 to 35659) and the NRS 115/60 kV transformer (branch 35851 to 36892). This contingency causes flows on the NRS-SRS #1 115 kV line in excess of 139% of the emergency rating (1,144 amps). SVP recently notified the CAISO and PG&E of this discovery.