



*Powering* The Center of What's Possible

## Silicon Valley Power Comments on the 2020-2021 Transmission Planning Process Study Plan

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The City of Santa Clara *dba* Silicon Valley Power (SVP) appreciates the opportunity to comment on the CAISO Draft 2020-2021 Transmission Planning Process (TPP) Unified Planning Assumption and Study Plan (Study Plan).

SVP believes the CAISO should, as part of the 2020-2021 TPP process, develop a long-term plan to reliably serve the Santa Clara/San Jose area. As noted in SVP's October 10, 2019 comments, the Preliminary Assessment Results identify multiple planning criteria violations serving the Santa Clara/San Jose load area for the baseline cases as well as the sensitivity case that models the load forecast provided by SVP. The later-published 2019-2020 Draft Transmission Plan continues to identify the same multiple violations. Within the Preliminary Assessment Results for the Greater Bay Area (GBA), the CAISO has identified "Continue to Monitor Load Growth" as the mitigation measure for these overloads.<sup>1</sup> SVP does not believe this mitigation measure is adequate. Specifically, SVP is concerned that identified transmission upgrades will not be constructed before the load growth forecasts become actual, as history has shown that CAISO-approved projects in the GBA fail to be constructed within expected time frames.

As identified in the table below, a lead-time of 6 to 15 years is common, even for projects of limited scope:

PROJECT NAME	ISO Approval	CONSTRUCTION STATUS**	Year the Project Expected to be in Service	DATE IN SERVICE per 2020Q1 AB970	Project Lead Time (Years)
Kearney-Herndon 230 kV Line Reconnector	2013	Operational	2019	Jan-19	6
NRS-Scott 115 kV Line Reconductoring	2013	Operational	2019	Feb-19	6
Wheeler Ridge-Weedpatch 70 Line Reconductoring Project	2013	Operational	2019	Mar-19	6
Metcalf-Evergreen 115 kV Lines	2002	Operational	2019	Apr-19	17
Kearney-Caruthers 70 kV Reconductoring	2013	Operational	2019	May-19	6
San Bernard-Tejon 70 kV Line Reconductoring Project	2014	Construction	2020	Jan-20	6
Fulton-Fitch Mountain 60 kV Reconnector	2009	Construction	2020	Apr-20	11
West Point - Valley Springs 60 kV Line Reinforcement	2007	Construction	2020	Aug-20	13
Pittsburg 230/115 kV Transformer Capacity Increase	2006	Engineering	2021	Jan-21	15
Moraga - Castro Valley 230 kV Line Capacity Increase Project	2011	Engineering	2021	Mar-21	10
Semitropic-Midway 115 kV Line Reconnector	2012	Construction	2021	Mar-21	9
Morgan Hill - Watsonville Area Reinforcement	2014	Engineering	2021	Jul-21	7
Clear Lake 60 kV Reinforcement	2009	Engineering	2022	Feb-22	13
Table Mountain 115 kV SPS	2011	Engineering	2022	Mar-22	11
South of Palermo 115 kV Reinforcement	2011	Construction	2022	Nov-22	11
Estrella Substation	2013	Engineering	2023	Nov-23	10
Bellota - Warnerville 230 kV Line Reconductoring	2013	Engineering	2024	Mar-24	11
SF 115 kV Cable Upgrades	2015	Engineering	2024	Sep-24	9

<sup>1</sup> 2019-2020 ISO Reliability Assessment - Preliminary Study Results for the *PG&E Greater Bay Area*, August 15, 2019, Pages 10, 11 and 13 of 31.



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The CAISO preliminary assessment shows overloads on the Newark-Northern Receiving Station (NRS) #1 115kV circuit as early as 2024, and the Newark-NRS #2 115kV circuit in the 2029 Summer Peak Assessment<sup>2</sup> for the “base” summer peak forecast. The overloads are much greater in the sensitivity case, which SVP believes is more realistic.

SVP is concerned that even if the CAISO starts to develop plans to mitigate the above-mentioned overloads in this year’s planning cycle, the required transmission upgrades may not be built in time to reliably serve the expected future loads in the Santa Clara/San Jose load area. The statewide effort to minimize the operation of gas-fired generation could further enhance the need for earlier mitigation of identified overloads, given the amount of gas-fired generation in the south Bay Area.

In summary, SVP believes it is important for the CAISO to develop a plan to serve the long term needs of the Santa Clara/San Jose load area in this year’s planning cycle.

SVP appreciates the opportunity to comment on the 2020-2021 Study Plan and acknowledges the significant effort of the CAISO and PG&E staff to develop this material.

If you have any questions concerning these comments, please contact Jeevan Valath at [JValath@SantaClaraCA.gov](mailto:JValath@SantaClaraCA.gov).

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<sup>2</sup> 2019-2020 ISO Reliability Assessment - Preliminary Study Results for the *PG&E Greater Bay Area*, August 15, 2019, Pages 11 and 12 of 31.