

Silicon Valley Power (SVP) Comments on the CAISO Reliability Assessment as part of the 2014-15 Transmission Plan

Silicon Valley Power appreciates the opportunity to comment on the CAISO Reliability Assessment as described in the materials related to and as contained in the stakeholder meetings of September 24 and 25, 2014.

Donald Von Raesfeld (DVR) Power Plant Modeling Assumptions

It has come to our attention that the CAISO summer peak base cases have modeled the SVP DVR plant at full output in the reliability studies for the South Bay area. While modeling the plant at full production may be appropriate in cases where the ability of the system to accommodate such operation is under study, SVP believes that the DVR plant should not be modeled on-line when assessing the reliability needs of the transmission system. SVP dispatches the plant based upon its resource portfolio needs and may not be dispatching the plant during times of high local load.

It appears that the plant was modeled off-line in the summer peak reliability bases cases until the previous planning cycle, when it was modeled on-line at a reduced output."¹ In recent studies with PG&E concerning potential internal changes to the SVP system, the system was modeled and reliability upgrades identified based upon maintaining sufficient capacity of the transmission system to accommodate non-operation of this plant.

SVP is not clear whether it is possible to adjust this planning assumption at this stage of the planning cycle. However SVP requests that in future planning cycles that the reliability of the transmission system be designed to accommodate the full range of DVR operation, including being off-line under non-emergency conditions.

SVP Supports BAMx Comments

SVP fully supports the BAMx comments and appreciates the opportunity to comment on the CAISO Draft 2013-14 Transmission Plan.

If you have any questions concerning these comments, please contact Ken Kohtz at (408) 615-6676 or kkohtz@SantaClaraCA.gov.

¹ Generating 120 MW in the prior cycle versus 163.5 MW in the current cycle.