EARTHJUSTICE

Via electronic mail November 14, 2017

Regionaltransmission@caiso.com

Re: Sierra Club Comments on 2019 Local Capacity Technical Study

On behalf of the Sierra Club, Earthjustice submits the following comments on CAISO's 2019 Local Capacity Technical Study. Sierra Club requests that: 1) CAISO revaluate 1-in-10 demand in the Moorpark area given sizable discrepancies in observed load and 1-in-10 projections; 2) local area need distinguish between voltage and generation need; and 3) any additional investment in voltage support to meet Moorpark area need be included in CAISO's transmission planning process.

CAISO's LCR assumption uses the CEC mid-case/low AAEE 1-in-10 peak load forecast for local capacity areas. CAISO's August 16, 2017 *Moorpark Sub-Area Local Capacity Alternative Study* forecast Moorpark area 1-in-10 demand at 1,723 MW.[1] The CEC does not provide a forecast for the Moorpark subarea. Instead, because Moorpark is a subset of the Big Creek/Ventura area included in the CEC forecast, CAISO relied on SCE's load forecast allocation methodology to derive Moorpark peak load.[2] However, actual load data suggests the Moorpark 1-in-10 forecast is significantly overstated. As shown in the attached load data, the highest Moorpark area load during the record breaking heatwave over the Labor Day weekend was 1,596 MW, 127 MW less than the 1-in-10 forecast assumed in the CAISO study. While the CAISO forecast is for 2022, given that the CEC Big Creek/Ventura mid-case/low AAEE forecast projects slightly declining peak load, one would expect 1-in-10 demand in 2022 to be similar or slightly lower than 1-in-10 demand today. Because SCE will soon be issuing an RFO to meet Moorpark area need, an accurate understanding of 1-in-10 demand is critical to ensuring the appropriate level of procurement. Accordingly, Sierra Club requests CAISO investigate the discrepancy between 1-in-10 peak demand assumptions for the Moorpark subarea and actual load data and make any necessary modifications to its determination of LCR need.

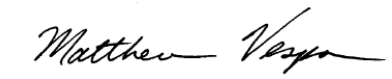
Second, CAISO has historically expressed local area need in terms of MW of generation. Yet the *Moorpark Sub-Area Study* underscores the distinction in voltage and generation needs where voltage collapse is the identified reliability concern. Thus, in the *Moorpark Sub-Area Study*, generation need was substantially reduced with the provision of voltage support. In

[1] CAISO, Moorpark Sub-Area Local Capacity Alternative Study (Aug. 16, 2017) p. 5, https://www.caiso.com/Documents/Aug16_2017_MoorparkSub-AreaLocalCapacityRequirementStudy-PuentePowerProject_15-AFC-01.pdf.
[2] *Id.* p. 10.

addition to continuing to distinguish between voltage and generation needs in the Moorpark area, CAISO's local area studies should include more transparent information on voltage and generation need in all of its local area studies. This added granularity will allow non-fossil resources capable of providing voltage support services to potentially meet local area need and reduce unneeded reliance on fossil-fueled generation.

Finally, given that voltage support substantially reduces local area need in the Moorpark area, as part of its Transmission Plan, CAISO should identify potential transmission upgrades, such as a synchronous condenser, to provide the requisite level of voltage support. Sierra Club intends to make this request in the Transmission Plan process but also raises the issue here given its relationship to meeting local area need in the Moorpark subarea.

Thank you for consideration of these comments.



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From: California ISO <MarketNotices@caisocommunications.com>
Sent: Thursday, September 28, 2017 12:35 PM
To: Matt Vespa
Subject: Release of Historical Load Data for the Moorpark Subarea Available for Limited Time

View the online version

Market Notice

September 28, 2017

REQUESTED ACTION
Information Only

CATEGORIES
Legal and Regulatory
Planning

Release of Historical Load Data for the Moorpark Subarea Available for Limited Time

SUMMARY
In response to a data request from the Center for Energy Efficiency and Renewable Technology (CEERT), the California ISO is releasing historical load data for the Moorpark subarea. The data will be available through October 31, 2017.

MESSAGE
In response to a data request from the CEERT, the ISO is releasing historical load data for the Moorpark subarea. This data was compiled by Southern California Edison Corporation (SCE) as the load-serving entity for the Moorpark sub-area. The data is will be publically **available through October 31, 2017** on the ISO website, Reports and Bullets webpage at

http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx under the *Special reports* heading.

Please note, SCE has indicated that the data provided in response to this request represents the net load value after reductions from any dispatched demand response programs. Demand response dispatches within the Moorpark sub-area are not readily available to be added back in to this net load value in order to determine the Moorpark area gross load.

CONTACT INFORMATION

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Moorpark subarea historical load data

This temporary data file is associated with the Center For Energy Efficiency And Renewable Technologies' data request

Response to Center For Energy Efficiency And Renewable Technologies' Data Request 9/28/2017 12:26

Date	Hour	MOORPARK LCR AREA TOTAL (all values in MW)
6/25/2017	0:00:00	577.3
6/25/2017	1:00:00	657.0
6/25/2017	2:00:00	622.4
6/25/2017	3:00:00	599.6
6/25/2017	4:00:00	589
6/25/2017	5:00:00	586.5
6/25/2017	6:00:00	579.6
6/25/2017	7:00:00	589.5
6/25/2017	8:00:00	625.2
6/25/2017	9:00:00	665.4
6/25/2017	10:00:00	714.3
6/25/2017	11:00:00	771
6/25/2017	12:00:00	823.8
6/25/2017	13:00:00	884.5
6/25/2017	14:00:00	950.6
6/25/2017	15:00:00	1013.5
6/25/2017	16:00:00	1048.7
6/25/2017	17:00:00	1078.3
6/25/2017	18:00:00	1080.9
6/25/2017	19:00:00	1053
6/25/2017	20:00:00	1013.7
6/25/2017	21:00:00	1010.8
6/25/2017	22:00:00	932.2
6/25/2017	23:00:00	827.6
6/26/2017	0:00:00	734.7
6/26/2017	1:00:00	678
6/26/2017	2:00:00	636.3
6/26/2017	3:00:00	614.5
6/26/2017	4:00:00	606.9
6/26/2017	5:00:00	622.1
6/26/2017	6:00:00	649
6/26/2017	7:00:00	721.6
6/26/2017	8:00:00	805.8
6/26/2017	9:00:00	860.5
6/26/2017	10:00:00	944
6/26/2017	11:00:00	1017.4
6/26/2017	12:00:00	1077.1
6/26/2017	13:00:00	1137
6/26/2017	14:00:00	1183
6/26/2017	15:00:00	1230.1
6/26/2017	16:00:00	1228.3
6/26/2017	17:00:00	1233.7
6/26/2017	18:00:00	1203.2
6/26/2017	19:00:00	1154
6/26/2017	20:00:00	1083

6/26/2017	21:00:00	1061.1
6/26/2017	22:00:00	960
6/26/2017	23:00:00	841.9
8/31/2017	0:00:00	918
8/31/2017	1:00:00	857
8/31/2017	2:00:00	813.5
8/31/2017	3:00:00	779.7
8/31/2017	4:00:00	763.9
8/31/2017	5:00:00	778.7
8/31/2017	6:00:00	836
8/31/2017	7:00:00	914.6
8/31/2017	8:00:00	1001.3
8/31/2017	9:00:00	1104
8/31/2017	10:00:00	1204.3
8/31/2017	11:00:00	1300.3
8/31/2017	12:00:00	1383.8
8/31/2017	13:00:00	1447.6
8/31/2017	14:00:00	1512.8
8/31/2017	15:00:00	1545.5
8/31/2017	16:00:00	1560.6
8/31/2017	17:00:00	1551.9
8/31/2017	18:00:00	1507
8/31/2017	19:00:00	1464.7
8/31/2017	20:00:00	1452.7
8/31/2017	21:00:00	1366.7
8/31/2017	22:00:00	1224.9
8/31/2017	23:00:00	1076.3
9/1/2017	0:00:00	962.8
9/1/2017	1:00:00	885.3
9/1/2017	2:00:00	837.7
9/1/2017	3:00:00	818.2
9/1/2017	4:00:00	808.7
9/1/2017	5:00:00	822.2
9/1/2017	6:00:00	876.5
9/1/2017	7:00:00	948.7
9/1/2017	8:00:00	1033.2
9/1/2017	9:00:00	1143.8
9/1/2017	10:00:00	1251.9
9/1/2017	11:00:00	1355
9/1/2017	12:00:00	1419.7
9/1/2017	13:00:00	1489.1
9/1/2017	14:00:00	1554.9
9/1/2017	15:00:00	1596.1
9/1/2017	16:00:00	1577.3
9/1/2017	17:00:00	1527.4
9/1/2017	18:00:00	1449
9/1/2017	19:00:00	1391.9

9/1/2017	20:00:00	1373.8
9/1/2017	21:00:00	1313.9
9/1/2017	22:00:00	1217.5
9/1/2017	23:00:00	1098.8