

TANC COMMENTS
ON THE CAISO'S DRAFT 2014-2015 TRANSMISSION PLANNING PROCESS
UNIFIED PLANNING ASSUMPTIONS AND STUDY PLAN

The Transmission Agency of Northern California (TANC) appreciates this opportunity to provide comments on the California Independent System Operator's (CAISO) Draft 2014-2015 Transmission Planning Process Unified Planning Assumptions and Study Plan. TANC's comments reflect concerns that were initially raised in the 2013-2014 Planning cycle regarding modeling and potential mitigations.

Accurate System Modeling

In its previous comments, TANC noted there were several inaccuracies in the modeling of facilities in northern California in the TTP studies. TANC understands scheduled in-service dates for system additions/upgrades can change and encourages all parties to carefully review and update, as necessary, the data for their facilities as modeled in the Western Electricity Coordinating Council (WECC) base cases and the cases used by the CAISO for its TPP studies. Maximizing the accuracy of the transmission system model in the TPP studies will help to assure stakeholders that the CAISO results in this planning phase accurately reflect the true nature of reliability, deliverability, and economics of the entire CAISO-controlled transmission system.

Mitigations to the Loss of the California Department of Water Resources Remedial Action Scheme

TANC would appreciate a closer look at the potential mitigation solutions that would be available to offset the loss of the California Department of Water Resources (CDWR) Remedial Action Scheme (RAS). The 2013-2014 transmission planning process identified several reliability issues due to the loss of the RAS and noted there were several potential options for mitigating these impacts; however, the primary mitigation solution discussed in the draft Transmission Plan was the curtailment of flows over the California-Oregon Interties (COI). We recommend that the CAISO give considerable attention to examining all the possible alternatives to the reliability issues raised from the loss of the CDWR RAS that does not entail limiting flows over a vital transmission path between California and the Pacific Northwest.

Economic Study Variations to Cost Model

As TANC has previously noted, Path 66 congestion in the previous planning studies has differed considerably from the historical congestion that has been seen. We continue to be

concerned that the economic analysis is too narrow in its focus and does not properly identify more potentially possible and reasonable future scenarios. A scenario which addresses the high level of congestion on Path 66 that has historically been the case should be a consideration. If the CAISO will continue to use the economic study methodology as in the past without consideration of historical congestion, then TANC requests an explanation of why such an approach is adequate and how historical congestion along Path 66 is actually being mitigated in the future.