

BAMx Comments on CAISO 2012/2013 ISO Transmission Plan Central California Study Scope

The Bay Area Municipal Transmission Group (BAMx)¹ appreciates the opportunity to comment on the CAISO 2012/2013 ISO Transmission Plan Central California Study (CCS) Scope. The comments and questions below address the Draft CCS Scope posted by the CAISO on April 19th and subsequently presented during a Stakeholder conference call on April 26th.

Our comments cover the following five major topics.

1. Importance of continuing stakeholder involvement;
2. Further explain purpose of study scenarios;
3. Emphasis on identifying the transmission need rather than justifying a specific project;
4. Need to maintain consistency with the CPUC resource portfolios; and
5. Investigate the Need Assessment Comprehensively.

1. Importance of continuing stakeholder involvement

Our ability to provide meaningful comments on the planning process is highly dependent upon the CAISO's facilitation of multiple interactions with stakeholders and timely response to each round of stakeholder comments. BAMx appreciates the CAISO's initiative in seeking Stakeholder input to the CCS scope. We request the CAISO to provide further opportunity to comment on the CCS scope before the CAISO finalizes it. In particular, once the CAISO posts the preliminary Base Cases, Stakeholders should be given an opportunity to review these cases and provide meaningful comments on them before the CAISO finalizes/utilizes them.

2. Further explain purpose of study scenarios

The CAISO study plan indicates that they plan to run four different types of study scenarios.

- Summer peak base case;
- Fall/Winter base case;
- Summer partial peak base case; and
- Spring Off-peak load base case

¹ BAMx consists of Alameda Municipal Power, City of Palo Alto Utilities, and City of Santa Clara, Silicon Valley Power.

The CAISO must further explain its “evaluation of need” process and how the four base cases are major components of the assessment. In other words, what will determine whether a project is needed for the purposes of this study?

3. Emphasis on identifying needed transmission in the assessment process rather than justifying a specific project

In the CCS Draft Scope document issued on April 19th, the CAISO indicates that the “Summer peak base case” “will also be used to quantify the difference in Fresno area LCR with and without the project.” Please identify “the project” the CAISO is referring to for purposes of this statement. Per our understanding, the purpose of this study is to identify a need for projects to satisfy certain reliability, economic and policy goals, and there is no presumption in terms of a specific project that would be studied under the proposed Central California study.

If a “project” is studied, we believe that more than one project should be studied as alternatives. This was made apparent in the work done under the Policy-Driven & Economic Study as part of the 2011-12 transmission plan.² That study indicated that there are various levels of increased transmission capability that could be made-- more expensive with more benefits, less expensive with fewer benefits. It appears that at least two different levels of increased capacity should be studied if “a project” has already been identified.

4. Need to maintain consistency with the CPUC resource portfolios

There might be tremendous renewables potential in Central California, especially in the Westlands area. However, it might not be needed to meet the current State goal of 33% RPS. Modeling any higher generation in a particular study area for the Central California Study than is needed for 33% RPS would not only be inconsistent with the current policy goal, but would also be discriminatory against renewables in other areas, which would not be given a similar opportunity. The CPUC renewable portfolios are currently being developed with Stakeholder input. Any arguments for special treatment for an area should be made as part of that process.

Furthermore, the draft CCS scope only includes the modeling of the following two CPUC portfolios while performing the economic planning studies, rather than all four portfolios.

- Base renewable portfolio; and
- The sensitivity renewable portfolio with the highest level of congestion cost.

² South PG&E Policy Driven Powerflow and Stability Results, 2011/2012 Transmission Planning Process Stakeholder Meeting: Policy-Driven & Economic Study Preliminary Results, December 8, 2011. See also Section 4.7.2 Southern PG&E Area in the CAISO 2011-12 Final Transmission Plan.

BAMx suggests that the CAISO expand its economic planning study beyond the two portfolios to include all four CPUC portfolios.

5. Investigate the Need Assessment Comprehensively

The CAISO needs to consider all possible mitigation measures to satisfy the transmission needs in Central California. They should not be restricted to large-scale capital projects, but should include other potential mitigation measures, such as,

- Utilize existing Helms RAS modification.
- Fully utilize the existing transmission line. Consider developing specific short-term ratings for the specific needs of the area. Consider line compensation and other alternatives like phase shifting transformers etc. to redirect flows if appropriate.

BAMx appreciates the opportunity to comment on the CCS scope under the CAISO 2012/2013 Transmission Plan and acknowledges the significant effort of the CAISO staff to develop the draft scope.

If you have any questions concerning these comments, please contact Barry Flynn (888-634-7516 and brflynn@flynnrci.com) or Pushkar Waglé (888-634-3339 and pushkarwagle@flynnrci.com).