Comments of Calpine Corporation

ISO 2012/13 Transmission Plan Draft Report & February 11 Stakeholder Meeting

Calpine appreciates this opportunity to submit comments on the CAISO's Draft 2012/13 Transmission Plan posted on the CAISO website on February 1, 2013 and the ISO February 11, 2013 stakeholder meeting.

1. North Coast /North Bay area study:

First, CAISO identified some reliability concerns around Eagle Rock-Cortina area for summer light load and offpeak scenarios in the study. The potential mitigation solutions CAISO proposed is to adjust the generation at Geysers. We urge PGE and CAISO to seek any other alternative such as SPS or uprating the line to resolve the local thermal overloading issues. Also, in the summer peak case, CAISO also proposed to adjust Geysers' generation as the potential solutions to mitigate the voltage violation under Category B contingency. Instead of adjusting generation, a voltage support device can also be installed to solve this problem. CAISO should consider these non-generation options to maintain the system reliability.

Second, the description in Appendix B, section B2.2.2.1 from Page B25 to B27 is very confusing about the Middletown 115kV Project. Middletown project shouldn't be formatted as the thermal overloading element.

Third, the Middletown 115kV project is the major project CAISO proposed to resolve the most reliability problems in the area. But it's not listed in the previously approved projects which are needed to mitigate the identified reliability concerns at the end of the section (2.5.2.3).

2. Table Mountain Transformer updates.

In CAISO's 2011-2012 transmission plan, CAISO identified Table Mountain 500/230kV transformer will be overloaded during summer peak both in 2016 and in 2021. But in the 2012-2013 transmission plan, the thermal overload only occurs in the 2022 summer peak case. What's the major contributor to the difference? In the previous plan, CAISO proposed to re-rate the transformer, but this year CAISO changed the plan and proposed to modify the existing RAS. What are the reasons except the cost concerns?

If you have any questions concerning these comments, please contact Hannah Wang (713-820-4120 and Hannah.wang@calpine.com).