



# IID

*A century of service.*

www.iid.com

*Since 1911*

**Comments of Imperial Irrigation District on  
Draft 2019-2020 Transmission Planning Process  
Stakeholder Meeting held on September 25, 2019**

**October 10, 2019**

IID appreciates the opportunity to provide comments on the CAISO's draft 2019-2020 Transmission Planning Process (TPP) Study Plan based on the information presented at the September 25, 2019 stakeholder meeting. IID has been reviewing potential participation in the North Gila to Imperial Valley #2 Project (NGIV2) for several years and has included the project in its recently adopted Integrated Resource Plan. IID believes NGIV2 will be a benefit to IID ratepayers both near and long term to help IID continue to be deliver low-cost energy. Specifically, IID believes NGIV2 will benefit IID by:

- Increasing reliability for the greater Imperial Valley area and providing an additional import/export outlet through the interconnection of the NGIV2 Project to the IID Highline 230kV substation;
- Providing access to IID's currently stranded bi-directional transmission capacity on the Palo Verde to North Gila path (including access to IID's ownership in the Hassayampa – North Gila #2 capacity); and
- Further strengthen the IID transmission system to enable delivery of additional renewable energy, including geothermal resources, to the CAISO and WestConnect areas.

While IID has not yet executed a full participation agreement with the NGIV2 Project development team, IID is considering and evaluating potential ownership in the project. For planning purposes only at this time, the CAISO Economic Modeling may include a scenario with an up to 30% ownership of NGIV2 by IID with the remainder being recovered as planned with the CAISO. Please note the 30% is a high level estimate for purposes of modeling only; although IID is exploring potential ownership, no definitive agreements have been negotiated and any such agreements would be subject to review and approval by the IID board of directors.