



November 30, 2016

Submitted to: CAISO (regionaltransmission@caiso.com)

Re: NEET West Comments on the CAISO 2016-2017 Transmission Planning Process Stakeholder Meeting (November 16, 2016)

NextEra Energy Transmission West, LLC (“NEET West”) appreciates this opportunity to provide comments on the 2016-2017 transmission planning process preliminary policy assessments as presented and discussed at the California Independent System Operator’s (“CAISO”) November 16, 2016 Transmission Planning Process (“TPP”) stakeholder meeting.

During the 2015-2016 and 2016-2017 TPP planning cycles, CAISO performed a special study to provide “information only” results that will support a state 50% renewable energy goal. Furthermore, NEET West recognizes the 33% renewable portfolio used in CAISO’s 2016-2017 TPP studies is approximately the same as that used for the 2015-2016 TPP studies. Given the modest shortfall in deliverability and the objective of reviewing reinforcement requirements when 50% policy renewable generation portfolios are available, NEET West understands that CAISO will not recommend any mitigation for policy purposes but this may be revisited in economic project evaluations. In order to address several contingency violations that were observed in several different transmission planning studies (including reliability as well), we observed the continued reliance on operating procedures, inclusive of the Special Protection Systems (SPS) and re-dispatch of resources to relieve transmission constraints and congestion. NEET West views these tools as near term only, and we recommend CAISO to take into account the complexity of operating procedures including SPS and any impact these schemes might have on the short-term and long-term operational and planning flexibility while comprehensively recommending system mitigations. A careful analysis should be undertaken to properly weight benefits and cost of SPS and re-dispatch of resources versus conventional transmissions solutions that might offer significant advantages to maximize not only the reliability of the grid but also provide the reliable deliverability of resources and robust operation of the transmission grid. This consideration will become even more important to support 50% RPS integration.

NEET West commends CAISO staff for all of the time and effort that it put into the 2016-2017 TPP. NEET West submits these comments with the goal of enhancing the processes utilized in the evaluation



of transmission planning policy studies in the transmission planning process. NEET West appreciates the opportunity to participate in the transmission planning process and to provide these comments.

Sincerely,

A handwritten signature in blue ink that reads "Edina Bajrektarević".

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