

## **SVP Comments on the CAISO 2012-13 Draft Transmission Plan**

City of Santa Clara, dba Silicon Valley Power Silicon Valley Power (SVP) appreciates the opportunity to comment on the Draft CAISO 2012-13 Transmission Plan. The comments below pertain to the draft Transmission Plan dated February 1, 2013 which was discussed at the February 11<sup>th</sup> Stakeholder meeting.

The draft Transmission Plan finds the PG&E proposed project “***NRS-Scott No. 1 115 kV Line Reconductoring***” to be needed to mitigate identified reliability concerns. SVP strongly supports this project. Furthermore, as noted at the stakeholder meeting, SVP believes that the scope of work should include both circuits of this critical transmission line.

The PG&E proposed project upgrades one of the two circuits of the approximately two-mile double circuit line 115 kV that terminates at Silicon Valley Power’s Northern Receiving Station (NRS) and Scott Receiving Station (SRS). The CAISO’s Annual Assessment indicates *Category B* loading violations for multiple single contingencies beginning in 2014. Additionally SVP has identified *Category C* contingencies that result in heavy overloads on this line. Such *Category C* contingency violations lend further support for the need to upgrade this facility.

However it must be noted that the difference in loading on the two circuits is driven by the system configuration and switching on the 115kV system. To maintain the flexibility to balance load flows on the two 115kv lines and enhance overall system reliability, SVP desires to be able to close the 115kv bus tie breaker at NRS as determined by future operational needs. Closing this breaker would potentially increase the flows on the NRS-Scott No. 2 115 kV circuit and reduce the effectiveness of solely reinforcing the No.1 circuit.

This double circuit line has already been reconducted in 2005 with 477 ACSS conductor. As such, installing a higher capacity conductor may involve significant tower work. Additionally this line transverses a congested urban area and crosses Highway 101. Given the continued increase in line loading that has resulted in the need for new reinforcements so soon following the completion of the last upgrade and the challenging conditions surrounding this line, SVP highly recommends that the No. 2 circuit be upgraded at this time as well.

Furthermore, given the overloads identified in the 2014 CAISO base case associated with this line, SVP recommends that the operative date for these upgrades be advanced to Summer 2014.

Lastly, SVP has been working with PG&E concerning potential improvements to the SVP transmission facilities in this area. The transmission studies with PG&E support considering a higher emergency conductor rating than 1,500 amps. We look forward to continued cooperation with both PG&E and the CAISO in the final conductor selection and coordinating the upgrades to both systems.

SVP appreciates the opportunity to comment on the CAISO 2012-13 Transmission Plan and acknowledges the significant effort of the CAISO staff and PG&E in the development of the draft plan.

If you have any questions concerning these comments, please contact  
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