

2020/2024 LCR Draft Technical Report

Draft Final

Dated: 4/10/19

Comments Submitted: 4/24/19

Summary:

Calpine emphasizes the comments submitted on the draft study scope recommending that the CAISO modify the contingencies modeled in LCR studies to conform to enforceable NERC Planning criteria. A copy of our previous comments are linked here:

<http://www.aiso.com/Documents/CalpineComments-2020LocalCapacityRequirementsDraftStudy.pdf>

The CAISO System Planning Criteria as applied to Local Capacity Technical Studies are inconsistent with NERC Planning Criteria and inconsistent with mandatory practices for Transmission Planning (TPL-001-4), and they should be modified to improve consistency. Specifically, several double-contingencies are ignored in the LCT scope and results¹.

Calpine recognizes that the ISO complies with this standard in its TPP process and does not understand the reluctance to using the full set of mandatory contingencies in the LCT Study.

As highlighted in our previous comments – which to our knowledge have not been addressed in the LCT Study – the CAISO seems to be in violation of its own tariff by ignoring valid and mandatory double contingencies in the LCT Studies. Calpine asks that the ISO explain the changes that it proposes in this or future cycles or explain its recalcitrance in the final drafts of the LCT Studies.

¹ Calpine has confirmed that Tables 2.1-1 in each of the Draft Technical reports contain formatting problems. Nonetheless, several double contingencies (such as T-1, system readjustment, T-1 or L-2 common mode contingencies) are not included in the analysis of local areas – even though they are enforced in TPP studies.