

The Fresno Avenal area (Gates-Tulare Lake 70kV line) congestion was selected for the final list of high priority economic planning studies in the 2019-2020 planning cycle. The analysis found that reconductoring of the Kettleman Hills Tap to Gates 70 kV line can mitigate the congestion of the line, but consistent with CAISO's Transmission Economic Analysis Methodology (TEAM), the benefit to cost ratio of 0.4 was not sufficient for the ISO to find the need for reconductoring the line. The CAISO reported that Fresno Avenal area congestion will be monitored and investigated in future planning cycles.

We're writing to submit the Fresno Avenal area for study in the 2020-2021 planning cycle for the purpose of minimizing congestion on the Gates-Tulare Lake 70 kV line, and delivery of a Location Constrained Resource. In addition, the TEAM framework explains that the value of a transmission upgrade may also hinge on who will ultimately bear the cost of the project. Depending on who ultimately funds the transmission project the applied discount rate could be different. We'd like to discuss with CAISO the use of a private discount factor for this project.

Thanks,

Ellen Jandt – Senior Asset Manager  
conEdison Development