

## CAISO 2019/20 TPP Policy & Economic Assessment: Stakeholder Comments

Submitted by	Company	Date Submitted
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LS Power appreciates the opportunity to provide comments on the CAISO 2019/20 Policy & Economic Assessment.

### **Economic Assessment:**

CAISO's Preliminary Economic Assessment shows congestion on the COI corridor between \$12m to \$61m per year and on Path 26 around \$19m. As clarified by CAISO at the Stakeholder meeting, COI congestion is in the North to South direction while Path 26 congestion is in the South to North direction. While not confirmed by CAISO, it appears that COI and Path 26 congestion issues show up during different hours in the day. We recommend CAISO investigate this and confirm. Further CAISO identified the list of high priority economic studies it is proposing to undertake in this TPP cycle. CAISO currently does not have any transmission solutions on its high priority economic studies list that would address COI corridor and Path 26 congestion. We strongly recommend that CAISO include the SWIP-North transmission project as a solution to COI corridor and Path 26 congestion issues. As a parallel path to both COI and Path 26, SWIP-North provides an alternate path for economic energy from the Pacific Northwest to flow into California, especially during evening peak, and allows exports out of CAISO during middle of the day oversupply conditions which would help reduce renewable curtailments.

Prior studies conducted by LS Power (through Consultants) show that SWIP-North transmission line allows for additional intra-day bidirectional flows by facilitating more imports into CAISO during evening peaks and more exports out of CAISO during oversupply middle of the day hours. This bidirectional flow pattern will not only help reduce COI congestion in the North to South direction, but also Path 26 congestion in the South to North direction. Not including SWIP-North on its high priority list will not allow CAISO to address these congestion issues.

We recommend CAISO include SWIP-North as a high priority economic study. Further we recommend CAISO implement contract path modelling for its economic planning study so a "wheeling charge free" 1000 MW path from Midpoint to Eldorado that SWIP-North provides to CAISO can be correctly studied.

LS Power thanks CAISO for the opportunity to provide these comments for the 2019-20 TPP.