# CAISO 2018 and 2022 Local Capacity Technical Study Final Results, 4/13/17: Stakeholder Comments

| Submitted by | Company | Date Submitted |
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LS Power appreciates the opportunity to provide comments on the CAISO 2018 & 2022 LCR Final Results presentation that was held on Apr 13th, 2017.

LS Power's comments are limited to the LA Basin-San Diego-Imperial Valley area combined LCR requirements. At the Apr 13th presentation, CAISO staff presented results of LCR Study for 2018 and 2022 cases. The studies were done using the baseline assumption for peak load, which is around 3pm. In addition to the baseline study, CAISO also added a Sensitivity study to evaluate the potential impact to the LCR requirements for the LA Basin-San Diego-Imperial Valley area at 6pm, which is roughly the time when Imperial Valley solar generation becomes unavailable. Given the most limiting constraint is thermal overload of a 230 kV line from El Centro to Imperial Valley and Imperial Valley generation is the most effective, CAISO staff saw the need for conducting this study to evaluate the impact of this on overall LCR requirements. CAISO's Sensitivity Study for 2018 showed the need for an additional 860 MW Local Capacity Requirement in San Diego/IV area (110 MW additional at Imperial Valley, plus an additional 750 MW in San Diego) around this time. The Sensitivity Study for 2022 shows significantly worse results and notes the overall deficiency in the San Diego/Imperial Valley area.

The Sensitivity Study conducted by CAISO was helpful in bringing to the forefront the issue of Peak Shifting from the solar additions. We believe this Peak Shifting scenario should not just be a Sensitivity Scenario for information only, but LCR requirements and procurement obligations should be equally based on this evaluation of the need during the evening peak, given the increased importance of net load between 6-10 pm in reliability planning. The reliability issues presented by this scenario are real and hence these should be addressed. We understand that this may require further fine tuning of the CAISO study model, including re-dispatch and load adjustments for other areas outside the study area to reflect accurate representation of evening peak conditions. We further understand that setting LCR requirements based on the evening peak scenario may also require updates to CAISO's LCR Study methodology and CPUC's RA Guide, but given the reliability risk, we believe all these changes should be implemented into the Annual and Long Term LCR Study processes at the earliest.

LS Power thanks CAISO staff for the opportunity to provide these comments.