



## **Comments of NRDC on the California Independent System Operator's 2012-2013 State Transmission Plan and February 11, 2013 Stakeholder Meeting Topics**

**Submitted by Carl A. Zichella, Director of Western Transmission**

**February 25, 2012**

---

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's natural resources, including in particular the nation's air, water, lands and resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

Our comments are as follows:

1. The statewide plan (The Plan) and February 11, 2013 workshop presentations includes very positive provisions NRDC supports, including:
  - a. Prioritizing the Gates-Gregg transmission alternative to take better advantage of the Helms pumped storage facility for renewable energy integration. We especially appreciate the designation of this upgrade for both reliability and additional policy benefits. As we have previously recommended multi-value lines should receive such consideration to capture system benefits like access to storage and opening new resource areas while reducing integration costs for renewable energy generation.
  - b. The upgrade of the Gates 500/230kv Transformer #2 by 2017
  - c. Pursuing SONGS replacement solutions that avoid increased emissions from existing power plants. We support the application of synchronous condensers to provide voltage support without new generation.
  - d. Working with SDG&E and Southern California Edison to explore ways to better utilize demand resources for local reliability and system needs related to a potential prolonged SONGS outage. This analysis has importance beyond just a contingency analysis for the absence if the SONGS units and could provide a range of meaningful approaches to meeting reliability and renewable energy integration issues in southern California.

2. The Plan could be improved by including an analysis of:
  - a. How the recommendations from North American Electricity Reliability Council and Federal Energy Regulatory Commission in the aftermath of the September, 2011 southwest blackout can help address long term planning for a contingency in which both SONGS and/or Diablo Canyon may not be available help to address and implement, including
    - i. Better coordination between BAAs
    - ii. Better information sharing between BAAs
    - iii. Better situational awareness across multiple BAAs.
  - b. The Mid-term Study should also include an analysis of the impact of distribution-grid improvements and the potential for distributed generation zoning on bulk grid operations and renewable energy integration. In particular harmonizing CAISO needs and utility demand response protocols would provide a valuable system benefit that could open the door to a substantially greater contribution of demand response resources to meeting local and system needs.
  - c. Moving up the in-service date for the Gates-Gregg transmission upgrade from 2022 to 2017. This would encourage rather than discourage renewable development being considered for the Westlands CREZ.
  - d. Sizing proposed lines for the Central Valley to meet future reasonable expected renewable energy development needs. A 500 kV upgrade should be considered in addition to the proposed 230 kV proposal.

Thank you for considering these comments.

Respectfully submitted,

A handwritten signature in blue ink that reads "Carl Zichella". The signature is written in a cursive, flowing style.

Carl Zichella  
Director of Western Transmission