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**California Independent System Operator Corporation**

250 Outcropping Way  
Folsom, CA 95630

RE: Comments on 2019-2020 TPP Process

Dear CAISO Planners,

The Nevada Hydro Company ("Nevada Hydro") makes this submission of comments for its Lake Elsinore Advanced Pumped Storage Project (FERC Project No. 14227) to the 2019-2020 Transmission Planning Process ("TPP") of the California Independent System Operator Corporation ("CAISO").

During its November 18 stakeholder meeting, the CAISO provided information on elements of its TPP. The CAISO requested that comments be provided today.

Nevada Hydro has undertaken its own TEAM analysis to try and replicate the CAISO's results. Unfortunately, we have seen different results from our analysis compared to the findings the CAISO has published. In order to better comment on the TPP process, we request the following:

- Nevada Hydro has much different reliability results than the CAISO has shown. Please provide the specific Base Cases and assumptions used to develop the LEAPS reliability results for the San Diego and SCE areas. We have signed NDA's in place already.
- Please provide the actual production cost data files to be used during the economic phase ahead of publishing the final evaluations. That way we can comment and correct inputs if so required prior to the release of final results. We, like everyone else, have no transparency into the actual analysis or possible mistakes in the analysis runs.
- Due to the problems at the Aliso Canyon gas storage facility, we believe LEAPS should be studied as an alternative to that facility.

We are concerned about the CAISO's reliance on the RAS schemes, as we do not believe they solve the problems long term and question why, at the same time, area utilities are going out for reliability services.

We hope with the future economic study methodology, the CAISO uses more realistic capacity numbers. Advanced pumped storage facilities like LEAPS provide "premium" services for both the full range of transmission benefits plus all five ancillary benefits. Many of these

services can be produced simultaneously. (LEAPS should have a “premium capacity number” that reflects the true value for fast response full ancillary service, with multi benefit analysis).

Nevada Hydro appreciates the CAISO’s attention, and remains available to assist with any aspect of the TPP process.

Sincerely

David Kates  
For The Nevada Hydro Company