



**ALAMEDA
POWER & TELECOM**

A Department of the City of Alameda

May 15, 2025

Chair Severin Borenstein
Vice Chair Joe Eto
Governor Angelina Galiteva
Governor Mary Leslie
Governor Jan Schori

California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

Subject: Comments on CAISO Draft 2024–25 Transmission Plan Proposals for North and South Oakland

Dear Chair Borenstein and Governors,

Alameda Municipal Power (AMP) is a major wholesale customer of Pacific Gas and Electric Company (PG&E), serving thousands of customers on Alameda Island through PG&E's North Oakland and South Oakland transmission systems. AMP appreciates the opportunity to provide comments on the CAISO Draft 2024–25 Transmission Plan proposals concerning these critical areas.

AMP supports the proposed addition of transmission capacity in both the North Oakland and South Oakland regions. Recognizing the increasing energy demands and the importance of a reliable grid, we encourage both CAISO and PG&E to explore opportunities to accelerate the completion of these vital projects, with a particular emphasis on prioritizing the timely completion of the North Oakland Reinforcement project.

We note that the Oakland Clean Energy Initiative (OCEI) project is assumed to be operational within the studies conducted for the North Oakland area, despite the fact that the storage component of the OCEI Project is years behind schedule. AMP has supported the OCEI project, but continues to have concerns regarding potential insufficient transmission capacity within the North Oakland system. This concern is amplified by the increased load forecast, the retirement of the Oakland Power Plant unit #2, and the anticipated retirement of the remaining two Oakland units at Station C, and the delayed 36 MW battery storage component of the OCEI Project.

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With the anticipated completion of both the North and South Oakland capacity increase projects, AMP seeks confirmation that the currently required AMP load transfers will no longer be necessary to support the transmission system's operational integrity. Additionally, we request confirmation that the Special Protection Scheme (SPS) currently in place at Station C will be decommissioned upon completion of these upgrades.

Accordingly, we respectfully request that the discussion of the "North Oakland Reinforcement Project" within the Final 2024–2025 Transmission Plan be updated to provide clarification regarding the elimination of the need for AMP load transfers and the removal of the existing SPS or Remedial Action Scheme (RAS) at Station C, known as "Oakland 115 kV C-X Cable OL RAS," following the project's completion.

Finally, AMP requests that CAISO and PG&E collaborate closely with AMP to minimize the necessity for load transfers prior to the completion of these essential upgrades, as well as during the construction phases. We believe that exploring all available options, including the implementation and utilization of the OCEI storage, play a significant role in mitigating potential disruptions to AMP's service.

Thank you for your time and consideration of these important comments. We appreciate the opportunity to provide input on the Transmission Plan and look forward to a robust and reliable energy future for the region.

Sincerely,



Tim Haines
General Manager
Alameda Municipal Power

Cc:

Mr. Elliot Mainzer, President and Chief Executive Officer, CAISO
Mr. Mark Rothleder, Senior Vice President and Chief Operating Officer, CAISO
Mr. Neil Millar, Vice President, Transmission Planning & Infrastructure Development, CAISO
Mr. Jeff Billinton, Director, Transmission Infrastructure Planning, CAISO
Mr. Binaya Shrestha, Manager-North, Transmission Infrastructure Planning, CAISO