

Submitted by	Company	Date
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SDG&E appreciates the opportunity to comment on the CAISO's Final 2021 Local Capacity Technical Study.

During the April 13, 2020 stakeholder meeting, the CAISO indicated that it performed a preliminary study in the LA Basin and San Diego-Imperial Valley ("SD-IV") areas to better understand the potential storage charging capability under a specific scenario in which a critical contingency lasts more than a single day and there is no local gas generation capacity available.

SDG&E appreciates this type of study and would like to better understand the results based on the CAISO's responses to the following questions in the final LCR study.

The preliminary results of the SD-IV area show a hypothetical scenario where the transmission system is upgraded or some portion of local gas generation is retained to provide up to 3600 MW of load serving capability under the critical contingency condition. This is increased from 2500 MW of load serving capability if the transmission system is not upgraded and there are no location gas generation.

1. What is the minimum amount of local gas generation that must be retained without upgrading the transmission network in order to achieve 3600 MW of load serving capability?
2. The need for retaining gas generation or upgrading the transmission system is dependent on the load forecast. Does the CAISO conduct sensitivity analysis for high load forecast under electrification scenario?
3. Are there other solutions to resolving this issue without the need to retain gas generation or upgrading the transmission network such as co-located storage?
4. How does the CAISO plan to use these results in the transmission planning process or the CPUC's Integrated Resource Plan proceeding?
5. If insufficient gas generation is retained and the transmission system is insufficiently upgraded, does this impact the deliverability of resources or eliminate the ability for storage resources to count towards providing Local resource adequacy?
6. Does this study incorporate other studies performed by the CAISO related to the LCR and use-limited resources? Specifically, in a scenario where certain gas generation is retained but are use-limited resources, does this impact the load serving capability to charge the storage devices?

Thank you.