

**Smart Wires Stakeholder Comments  
CAISO 2021 and 2025 Final LCR Study  
4/15/2020**

Smart Wires requests that the CAISO re-evaluate the Tesla – Delta Switchyard 230 kV line reactance project (“Project”) should the Greater Bay Area (GBA) Local Capacity Requirement (LCR) be revised and reduced via a solution provided by PG&E.

Given the CAISO’s response to PG&E’s comments posted on April 9<sup>th</sup> 2020, it is Smart Wires’ understanding that the CAISO will continue to work with PG&E to explore options to reduce the GBA requirement as noted below:

*“The CAISO will continue to work with PG&E planning and operations departments to explore options that can be implemented such that within 30 minutes after the loss of the transformer bank, the flows from Metcalf are diverted to other 500/230 kV stations serving the Bay Area in a manner that will result in reduction of local capacity requirement. PG&E should move forward expeditiously with rerates for the Metcalf 500/230 kV transformer banks if technical data supports such an action.”*

In addition, the CAISO’s response to Smart Wires’ most recent set of comments also included that the Tesla – Delta line reactance project:

*“can be reassessed if the requirement for the overall Greater Bay Area is reduced such that the Contra Costa sub-area local resources are not required towards satisfying the overall Greater Bay Area requirement.”*

Smart Wires interprets CAISO’s comments to indicate that if GBA LCR is reduced, the Project may provide material benefit.

Therefore, Smart Wires is submitting these comments to encourage the CAISO to re-evaluate the Project if the GBA LCR requirement is reduced pending further discussions with PG&E. As stated in our earlier comments, if the CAISO finds the Benefit-Cost Ratio (BCR) of the Project, or a scaled reactance solution as described on Smart Wires March 30 comments, to be favorable, Smart Wires encourages the CAISO to approve the project and include the reduced LCR need for the Contra Costa Sub-Area in the Final May 1 LCR Study Report submitted to the CPUC.

Smart Wires appreciates this opportunity to comment and commends the CAISO for its continued engagement with stakeholders as we strive to find the most cost-effective solution to meeting LCR needs.