

November 5, 2024

California ISO Board of Governors:

The City of Santa Clara, dba Silicon Valley Power (SVP), appreciates the opportunity to submit written comments in advance of the upcoming CAISO Board of Governors Meeting on November 12, 2024. As the CAISO is aware, SVP's load is expected to grow significantly during SVP's 10-year planning horizon, primarily driven by hyper-scale data centers. Specifically, SVP's 10-year planning horizon anticipates SVP's 1-in-10 peak load forecast to increase to 1,368 MW in 2034. For perspective, SVP's current peak load is 713 MW. SVP greatly appreciates the CAISO's attention to the transmission capacity deficit in the San Jose Area, including with respect to SVP's service territory, and the approval of the LS Power project in the CAISO's Transmission Plan which will greatly reduce the anticipated deficit.

SVP Supports Approval of the CAISO-Proposed "Hybrid" Transmission Project for the San Jose Area

During the stakeholder meeting on September 23, 2024, the CAISO presented the San Jose Area Transmission Plan Update. If approved, the CAISO-proposed "Hybrid" transmission project ("Hybrid project"):

1. Replaces the previously approved HVDC line between PG&E's Newark Substation and SVP's NRS Substation with a high capacity 230 kV AC line;
2. Includes a 1,000 MW HVDC link between PG&E's Metcalf Substation and PG&E's San Jose B 230 kV Substation, instead of the 500 MW HVDC project approved in the CAISO's 2021-2022 TPP; and
3. Includes a high capacity 230 kV AC circuit between PG&E's San Jose B and SVP's NRS Substation.

As explained in detail in SVP's written comments (attached for reference) submitted on October 8, 2024, SVP's independent assessment indicates that adding the proposed high capacity 230 kV AC circuit between San Jose B and NRS (assuming PG&E's FMC-KRS 115 kV line connecting SVP with the PG&E system were reconducted as well) would increase SVP's import capability and improve the San Jose Area's overall reliability. For these reasons, SVP strongly supports the approval of the Hybrid project.

Given SVP's projected load growth, SVP also agrees with the CAISO that "other local 230 kV and 115 kV upgrades to the existing facilities..." must be "...included in the 2024-2025 TPP"¹ to further increase SVP's load serving ability. SVP will provide comments in support of those additional upgrades at the appropriate time in the CAISO's Transmission Planning Process.

SVP requests that the CAISO management recommendation of the "Hybrid" project in the CAISO Board meeting on November 12, 2024 be approved, including acknowledgement of the mitigation measures needed to address the resultant adverse impacts to SVP.

Sincerely,



Manuel Pineda
Chief Electric Utility Officer
Silicon Valley Power

¹ "San Jose Area Transmission Plan Update," CAISO 2024-25 Transmission Planning Process Stakeholder Meeting September 23-24, 2024, page 33.