

TransCanyon LLC's Comments

CAISO 2016-2017 Transmission Planning Process

Submitted by	Company	Date Submitted
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TransCanyon, LLC (“TransCanyon”) appreciates CAISO’s efforts in producing the reliability assessment presented at the 09/21-22 stakeholder meetings. We are in general agreement with the reliability results and study methodologies for special studies presented at the stakeholder meeting.

We encourage the ISO to continue to monitor the Once-Through Cooling (“OTC”) generation along with retirement of aging assets and early economic retirement of generating units and their impact on overall system reliability. TransCanyon understands that the reliability analysis and results indicate the need and dependency on various potential mitigation plans, interim action plans that include load transfer, or re-dispatch of generation, in addition to use of preferred resources under many outage conditions. Recognizing the value of such measures under certain circumstances, TransCanyon also notes that operating the current transmission infrastructure by means of numerous operating procedures could lead to compromised reliability or other undesirable consequences during real-time system operations.

TransCanyon generally agrees with the findings presented in the reliability assessment for minimum generation requirements for the LA Basin and San Diego areas and is looking forward to understanding system capability from the long-term assessment at the next stakeholder meeting. In addition we are also keen on understanding the results of the economic early retirement of gas generation based on the proposed methodology.

Based on the reliability analysis, especially in the LA Basin and SDG&E system under stressed system conditions, the CAISO needs to maintain minimum generation based on Local Capacity Requirements, which may be difficult based on the gas-electric coordination study and early economic retirements study. We expect new transmission capacity into the region will be complementary to other proposed mitigations and will make the system more robust and reliable.

CAISO

TransCanyon appreciates the CAISO's facilitation of the 50% scenario work with the Northern Tier Transmission Group and WestConnect as a part of the Interregional Transmission Planning project evaluations. Consideration of the 50% Special Study, Interregional Coordination Update, and RETI 2.0 objectives for considering wind renewables in Wyoming and New Mexico are important to the overall scope of the 2016-2017 regional studies.

TransCanyon appreciates the opportunity to review the proposed methodologies for special studies and looks forward to reviewing the results of the studies at the November 16, 2016, stakeholder meeting.

Thank you for the opportunity to provide these comments.

About TransCanyon

TransCanyon is an independent developer of electric transmission infrastructure for the western United States. It is a joint venture between Berkshire Hathaway Energy's subsidiary, BHE U.S. Transmission, and Pinnacle West Capital Corporation's (NYSE: PNW) subsidiary, Bright Canyon Energy.