

Valley Electric Association, Inc. Comments on CAISO Transmission Planning Assumptions

December 5, 2013

Valley Electric Association, Inc. (VEA) is pleased to submit the following comments on the CAISO Transmission Planning Process (TPP) assumptions presented on November 20-21, 2013.

In particular, VEA requests that the CAISO revise its TPP renewable portfolio assumptions for the central Nevada (Nevada-C) CREZ Region to reflect the MW build out assumed in the portfolio direction provided by the CPUC in its February 7, 2013 Portfolio Transmittal Letter. In the CPUC-provided assumptions, 316 MWs of renewables were assumed for development in the Nevada-C Region in each of the Commercial, Environmentally Constrained, and High DG cases. However, in the CAISO's Economic and Policy assumptions provided during the November 20, 2013, meeting, the CAISO indicated that only 166 MWs of renewables were being assumed for the Nevada-C Region.²

The CAISO's rationale provided during the meeting for only including 166 MWs of the 316 MWs offered by the CPUC was that only these 166 MWs were on the CAISO-controlled grid. However, VEA's understanding from the CAISO's TPP study plan is that a main driver for including the CREZ-area renewables is to ensure that there is sufficient deliverability across the ISO interties to deliver those renewables that the LSEs are finding viable to fulfill their California policy needs.³

VEA requests that the CAISO revise its Nevada-C assumptions back to the CPUC-provided value of 316 MWs. If the ISO continues to believe that it is appropriate for the CAISO to include less than 316 MWs of Nevada-C renewables in its TPP, we ask that the CAISO provide a detailed explanation for the basis of the modification to the CPUC assumptions.

Thank you for your consideration.

Chris Fourthule

Chris Tomchuk

Executive Vice President of Engineering and Operations

¹ See http://www.caiso.com/Documents/2013-2014RenewablePortfoliosTransmittalLetter.pdf.

² See http://www.caiso.com/Documents/PresentationDay1 2013-2014TransmissionPlanningProcessNov20 2013.pdf, slide 8.

³ See for example, Section 3.1.2, Supporting RA Deliverability Status for Needed Renewable Resources Outside the ISO Balancing Authority Area, of the 2013-2014 Final TPP Unified Planning Assumptions and Study Plan (http://www.caiso.com/Documents/FinalStudyPlan-2013-2014TransmissionPlanningProcess.pdf).