

## **BAMX Comments on the Moorpark-Pardee 230 kV No. 4 Circuit Project Evaluation Materials from the January 11, 2018 Stakeholder Meeting**

The Bay Area Municipal Transmission group (BAMx)<sup>1</sup> appreciates the opportunity to comment on the materials presented during the Moorpark-Pardee 230kV No. 4 Circuit Project stakeholder call that took place on January 11<sup>th</sup>, 2018. We request that the CAISO address these issues in its draft comprehensive Transmission Plan expected in January 2018.

### **LCR Need Driven by an Extreme Event Type of Contingency**

In assessing the local capacity requirements for the Moorpark Area, the CAISO indicated that it has followed the Local Capacity Technical Study Criteria as defined in the CAISO Tariff.<sup>2</sup> These criteria are to “determine the minimum amount of Local Capacity Area Resources in MW that must be available to the CAISO within each identified Local Capacity Area.”

Meanwhile reliability driven transmission solutions are identified “to ensure System Reliability consistent with all Applicable Reliability Criteria and CAISO Planning Standards.”<sup>3</sup> There is a distinction between the standards used in identifying transmission reliability upgrades and the Local Capacity Technical Study Criteria. This difference specifically is in the treatment of a particular Extreme Event as follows:

“No voltage collapse or dynamic instability shall be allowed for a Contingency in Category D – extreme event (any B1-4 system readjusted (Common Mode) L-2), as listed in Section 40.3.1.2.”<sup>4</sup>

This performance requirement is beyond that required in the NERC TPL-001-4 Categories P0-P7 and is not specifically addressed in the CAISO Planning Standards. As such, from a transmission planning perspective, the loss of a single element followed by the loss of a double circuit tower line would be categorized as an Extreme Event. Extreme Events are not routinely used to justify reliability projects in the CAISO Transmission Plan.

In summary, the CAISO tariff seems to confirm our understanding that the LCR criteria is used to determine the generator capacity within a local area which would need to be contracted and not used in determining transmission expansion plans.

For the Moorpark area, the LCR deficiency is driven by just such a contingency, “*the loss of the Moorpark–Pardee #3 230 kV line followed by the loss of the Moorpark–Pardee #1 and #2 230*

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<sup>1</sup> BAMx consists of City of Palo Alto Utilities and City of Santa Clara, Silicon Valley Power.

<sup>2</sup> ISO Tariff Section 40.3.1

<sup>3</sup> ISO Tariff Section 24.4.6.2

<sup>4</sup> ISO Tariff Section 40.3.1.1 (2)

*kV lines, which causes voltage collapse.”*<sup>5</sup> So the performance of the Moorpark area has not been shown to violate Applicable Reliability Criteria and CAISO Planning Standards, yet still shows a LCR deficiency. It should be noted that LCR deficiencies occur in other LCR areas which have not been identified as requiring reliability driven transmission upgrades.<sup>6</sup> So this situation is not unique.

Nonetheless SCE’s proposed Moorpark-Pardee 230kV No. 4 Circuit Project is driven by the Local Capacity Technical Study Criteria deficiency caused by the retirement of generation in the Moorpark area.

BAMx members request that the CAISO provide additional clarification as to why this project is necessary to meet the Applicable Reliability Criteria and CAISO Planning Standards and whether this area is an exception for which reliability driven upgrades are being proposed for an extreme event. If Moorpark is an exception, further information is needed as to why it is exceptional. If it is not an exception, additional stakeholder involvement is needed and the CAISO Planning Standards would need to be modified before such a performance requirement is routinely applied.

### **Conclusion**

BAMx appreciates the CAISO reviewing this project and providing an opportunity for Stakeholder comment on the Moorpark-Pardee 230kV No. 4 Circuit Project before the issuance of the draft TPP plan. We look forward to the CAISO addressing our comments.

If you have any questions concerning these comments, please contact Kathleen Hughes (khughes@SantaClaraCA.gov or (408) 615-6632).

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<sup>5</sup> Moorpark Sub-Area Local Capacity Alternative Study (August 16, 2017)

<sup>6</sup> See 2018 Local Capacity Technical Analysis: Final Report and Study Results, May 1, 2017, page 2.