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Potential Questions for Energy Division – September 9th

Questions:

Basic Project Objective 1 – Increase system deliverability by at least 2,200 MW

1. What metrics (e.g., presence of PPAs) did ED use to determine level of need in the project area?
 - a. How if at all were the following metrics used?
 - i. Interconnection requests,
 - ii. LGIAs
 - iii. PPAs
 - iv. RPS Calculator
 - b. Why were the chosen metrics used?
 - c. What metrics were eliminated, if any and why?
2. How was the assignment of existing transmission deliverability to earlier queued projects without PPAs considered when developing Basic Objective 1?
 - a. Where in DEIR is this evaluation described?
 - b. What supports this as reasonable?
3. What assessment was made regarding whether additional capacity (RA) is needed from intermittent resources at a system level?
 - a. If none, why not? Where explained in DEIR?
 - b. If an assessment was made,
 - i. What was the methodology used?
 - ii. What data and source of data used?
4. How was the reduced role of solar resources under the Effective Load Carrying Capability (ELCC) method in providing capacity considered regarding Objective 1?
 - a. If not considered, explain why not?
 - b. If considered, where is the methodology and data used shown in the EIR?

Basic Project Objective 2 – To support achievement of State and Federal renewable energy goals

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These goals are energy goals while the WODUP is being put forth as a Delivery Network Upgrade, which is to support RA capacity counting.

1. Why does the Energy Division consider the WODUP upgrades as needed to achieve these renewable energy goals?
 - a. Where does DEIR state the need?
 - b. What methodology and data were used?

2. What independent security constrained production cost simulation studies were performed by ED to estimate potential congestion/renewable curtailment relief that could be attributed to WODUP?
 - a. If none, why not?
 - b. If done, what methodology and data used?
 - c. Where is it included in DEIR?

Additional Project Alternative

A project of more reduced scope than the Phased Build alternative should be included among the alternatives. This alternative would be limited to the work identified in the Phase Build alternative that is located on the Morongo lands. The remaining portions of the line would not be upgraded and the series reactors and SPS would remain in service so that the total capacity of the transmission system would remain as it is today.

1. Would ED regard such an alternative as feasible?¹ If not, why not?
2. Would ED consider such an alternative as preferred if it had a lower environmental impact than the Phased Build alternative? If not, why not?
3. Would ED consider such an alternative as preferred if:
 - a. It met a restated Basic Project Objective 1 that focused on current PPA capacity in the Riverside East area?
 - b. It also met Basic Project Objective 2 on an energy basis?

Alternatives Screening Report

ORA is highly supportive of the ED's recognition that the attrition rate in the CAISO queue is high and therefore neither the queues nor the LGIAs, are a good indicator of transmission need.

The focus of the transmission analysis is the CAISO 2024 Summer Peak Reliability base case.²

¹ Note that a supplemental transmission investment for the Morongo tribe may need to be identified for this option.

² Though the power system also investigated the system performance with the Cluster 7 Phase 1 generation pattern, the report finds the Phase Build alternative as a viable option and identifies the basis for this finding though it provides insufficient capacity to accommodate this generation pattern.

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1. How does the 3,754 MW of operating generation identified in Table A4 link back to the 2,200 MW identified in Basic Objective 1?
2. How does the 3,754 MW of operating generation identified in Table A4 link to the RPS portfolios provided by the CPUC and CEC to the CAISO?
3. How does the 3,754 MW of operating generation identified in Table A4 link back to the amount of executed PPAs in the area?

With respect to the power system study methodology,

4. Please confirm that the 2,300 double contingencies studied include sequential, overlapping events (*N-1-1*).

Note that the referenced Generator Interconnection and Deliverability Study Methodology Technical Paper indicates that the CAISO's Deliverability Study Methodology only considers single contingency and common mode N-2 contingency analysis and bus outages.³

5. How would the findings of the technical study differ if *N-1-1* events were removed from the analysis?
6. The Screening Report should be expanded to include a GE PSLF ".epc file" that documents all the changes made to the CAISO 2024 Summer Peak Reliability base case for this portion of the SCE system, including the Phased Build alternative.

³ Generator Interconnection and Deliverability Study Methodology Technical Paper, p. 6. Note that this is a reasonable study methodology as normal planning practice is to allow generation redispatch between the initial and subsequent events.