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Subject: R.12-03-014 DRA's revised modeling proposal and suggestions re Track 4 modeling

Dear ALJ Gamson,

At Friday's PHC, I stated that DRA would like the opportunity to do its own power flow modeling in Track 4 (SONGS) of the LTPP proceeding. I would like to revise that proposal. DRA would like the opportunity to review the results of, and the assumptions contained within, CAISO's (and SCE/SDG&E's) power flow modeling using the Power World model, but does not propose to do its own separate modeling executions unless CAISO (and SCE/SDG&E) fails to include reasonable assumptions for EE, DR, and at least some replacement of reactive power that reflect the efforts that would be made in the absence of SONGS.

In particular, we note that reactive power resources were not at issue when vetting Track I scenario assumptions that were documented in Decision 13-02-015 but will be an important consideration with SONGS offline. It's reasonable to assume that by 2022 increases in both dynamic and static VAR resources would be seen on a grid without SONGS (e.g., we'd presume conversion of at least one, if not both of the SONGS generating units to synchronous condenser operation would be considered). DRA therefore respectfully requests that the Scoping Memo include an additional scenario with assumptions that reflects the likely outcome that if SONGS is retired, the CPUC would solve the need with the use of EE and DR and the effective location of reactive power solutions. This might be in the form of a "book end" to the main scenario.

In addition, DRA respectfully recommends that after the issuance of a revised Scoping Memo, which we expect will include the assumptions that will be used for Track 4 power flow modeling, that the Commission host a workshop so that parties can understand exactly how the assumptions will be used, and have the opportunity to note any significant errors. Given that the Track 4 modeling tool and intent it's important that stakeholders understand any differences between how the assumptions are used for Track I and Track IV.

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