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March 21, 2012

Mr. Robert W. Sparks, P.E.
California Independent System Operator
P.O. Box 639014
Folsom, CA 95763-9014

Subject: Classification of the Simultaneous Contingency of the Southwest Powerlink and Sunrise Powerlink

Dear Mr. Sparks:

The purpose of this letter is to confirm our telephone discussion of March 9, 2012, concerning the proper treatment of the simultaneous outage of the Imperial Valley-Miguel and Imperial Valley-Suncrest 500 kV lines for the 2012/2013 Transmission Planning Process.

Prior transmission planning cycles have treated this outage as a credible N-2 and thus have required that the system meet the performance criteria for a NERC Category C.5 contingency, in accordance with the WECC common-corridor standard then in force (WECC-0071). A revised common-corridor standard (TPL-001-WECC-CRT-2) was approved by the WECC Board of Directors in December, 2011, with an enforcement date of April 1, 2012, that substantially changes the criteria for common-corridor lines. SDG&E believes that the Imperial Valley-Miguel portion of SWPL and the Sunrise Powerlink no longer meet the revised definition of Adjacent Transmission Circuits, and thus the simultaneous N-2 outage of these two lines would be allowed to meet the less restrictive NERC Category D performance criteria.

According to the revised common-corridor standard TPL-001-WECC-CRT-2[1] Requirement R1, two transmission lines on separate structures may be required to meet NERC Category C.5 performance criteria if the lines are 1) 300 kV or higher, and 2) have centerlines separated by 250 feet or less for a total linear distance of three miles or more[2]. The Imperial Valley-Miguel portion of SWPL and the Sunrise Powerlink meet the first criteria but not the second.

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[1] http://www.wecc.biz/library/Documentation%20Categorization%20Files/Regional%20Criteria/TPL-001-WECC-CRT-2%20System%20Performance%20Criterion%20-%20Effective%20April%201%202012.pdf

[2] WECC Glossary Proposal, definition for "Adjacent Transmission Circuits", pg. 2 - http://www.wecc.biz/library/WECC%20Documents/Publications/WECC%20Glossary%2012-9-2011.pdf

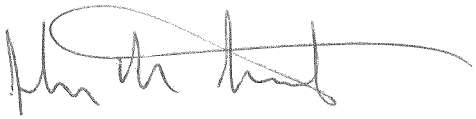
There are two locations where SWPL and the Sunrise Powerlink centerlines are separated by less than 250 feet:

1. From the western boundary of Imperial Valley substation to structure EP362-1, for a total linear distance of approximately 1,509 feet.
2. From between structures EP252-1 and EP252A-1 to between structures EP254-3 and EP255-2, for a total linear distance of approximately 2,092 feet. This location is close to the proposed site for the ECO substation.

Total linear footage of the common corridor of SWPL and Sunrise where there is 250' or less of centerline separation is approximately 3,601 feet, well below the three-mile limit allowed in the revised WECC common-corridor standard. Based on this, SDG&E Transmission Planning will be treating the simultaneous N-2 of the IV-Miguel and IV-Suncrest 500 kV lines as a Category D contingency during the 2012/2013 Grid Assessment study cycle. As we discussed, the N-1-1 of these two lines with system readjustment between each line outage will still be considered a Category C contingency.

Please feel free to contact me if you have any further questions.

Sincerely,



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