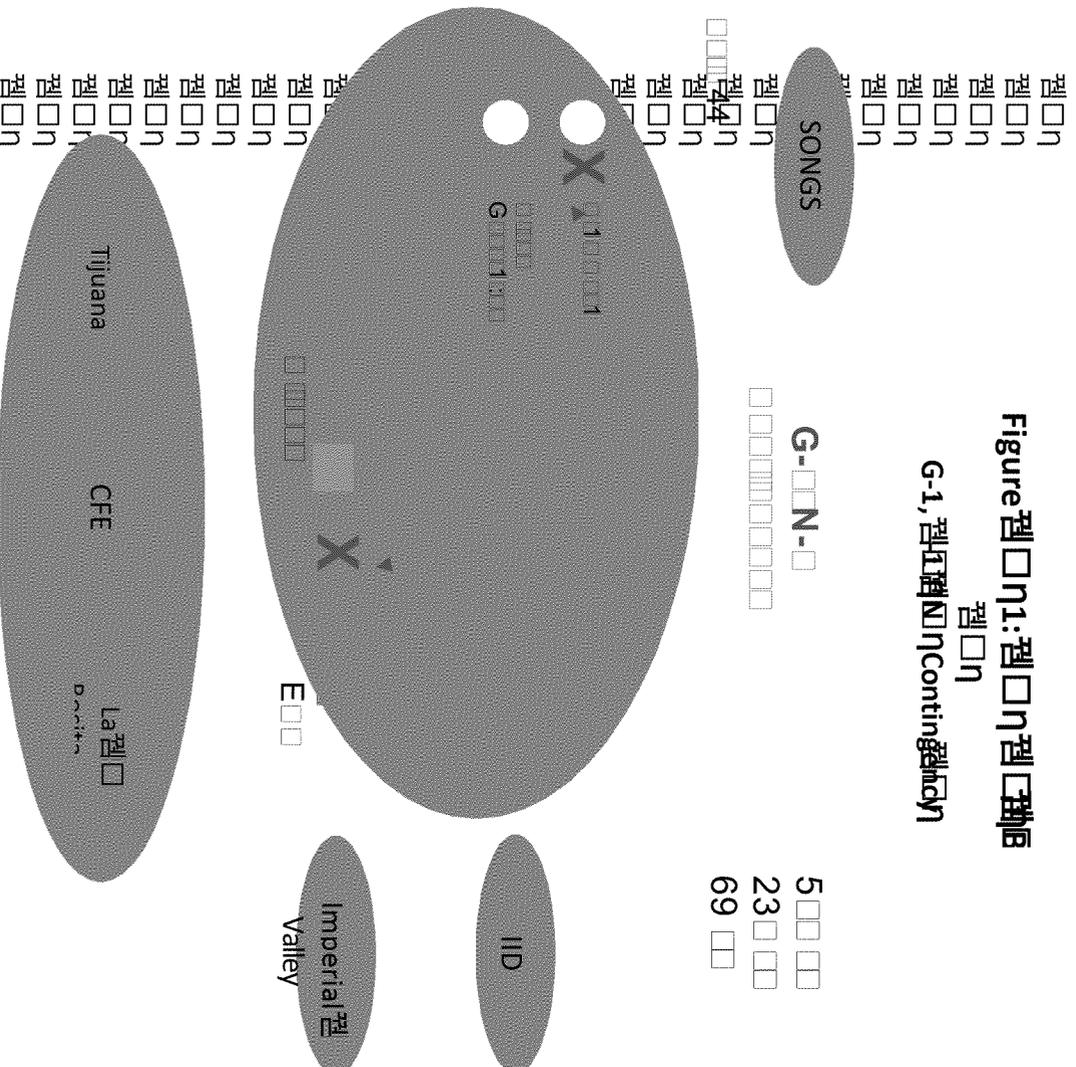


Figure 1: Continuity
 G-1, Continuity



Under these circumstances, the import level into the San could be subtracted from the peak load to determine the Netay Mesa generator output. The capacity requirement for the outage of this unit is approximately 500 MW. The results, from the need to provide the unit, are shown below.

Table 1: LCR Area Peak Load (MW) Diego

Study Area	2021
	4 A (MW)
10 Peak Load Area	5,749
Import Capability with	-2500
Loss of Otay Mesa	+605
LCR-N	3 854

MW
MW

As explained previously, the most severe constraint on the system is the requirement. Before the project, the system was able to handle a peak load of 5,749 MW. The contingency for the loss of a single 230 kV path (44 transfer paths) is 2,500 MW. The loss of the Otay Mesa generator is less than a single 230 kV path. The results show higher local capacity than the system requires. The outage was not relevant in the capacity requirements. The Sunrise project was observed operating at its limit based on final limits. The limits were the same as before the project. The stability limits were not affected.

MW

After the construction of Sunrise:

Following the construction of the Sunrise project, the system's peak load is 3,854 MW. The contingency for the loss of one 500 kV circuit (Sunrise or S1 500 kV circuit) is 2,500 MW. That is because each line is capable of producing 1,200 MW. The system's peak load is shown in Figure 2 below.

MW

MW

Table 2: ILCR in the Area

Study Area		2021 ILCR
10 Peak Load Area		4 A- ()
Imports Available		5,749
		3086
		2 524 – 2 663

The ILCR results indicate that the ILCR for the 10 Peak Load Area is 4 A- (), which is less than the 1000 ILCR threshold. The ILCR for the Imports Available area is 5,749, which is greater than the 1000 ILCR threshold. The ILCR for the Voltage Collapse area is 3086, which is greater than the 1000 ILCR threshold. The ILCR for the Sunrise area is 2 524 – 2 663, which is greater than the 1000 ILCR threshold.

Comparing the ILCR results for the 10 Peak Load Area and the Imports Available area, the ILCR for the 10 Peak Load Area is 4 A- (), which is less than the 1000 ILCR threshold, while the ILCR for the Imports Available area is 5,749, which is greater than the 1000 ILCR threshold. This indicates that the ILCR for the Imports Available area is significantly higher than the ILCR for the 10 Peak Load Area. The ILCR for the Voltage Collapse area is 3086, which is greater than the 1000 ILCR threshold, indicating a high level of risk. The ILCR for the Sunrise area is 2 524 – 2 663, which is greater than the 1000 ILCR threshold, indicating a high level of risk.

	Before ILCR Analysis	After ILCR Analysis
Sunrise ILCR 500 kV	No	No
Sunrise ILCR related 230 reinforcement	No	YES
SWPL ILCR (Imperial 500 kV line)	No	No
Otay ILCR (Mesa generation)	No	Yes
Otay ILCR (Mesa voltage functioning)	No	Yes
Limiting ILCR function studied	N-1 employed for Sunrise	Voltage collapse

The ILCR results indicate that the ILCR for the 10 Peak Load Area is 4 A- (), which is less than the 1000 ILCR threshold. The ILCR for the Imports Available area is 5,749, which is greater than the 1000 ILCR threshold. The ILCR for the Voltage Collapse area is 3086, which is greater than the 1000 ILCR threshold. The ILCR for the Sunrise area is 2 524 – 2 663, which is greater than the 1000 ILCR threshold.

6

- 14 full plant trips of Metcalf between Sept 2009 and
- full plant trips of Palomar between July 2009 to

Based on this review, the data does not support treating separate generators, but in general, single generators for contingency analysis.

Q5: The question was raised about the profile of the ISO's whether the ISO considered all solar generation to use

Response:

The ISO has not assumed all solar generation to be an extensive process for by developing different profiles for solar resources in 2020 based on the expected portfolios' profiles accounted for different ISO technologies, 2,588MW of (2,464, Thin Film Fixed, 1,045MW fixed small solar, 1,749MW geographically distributed, 1,560MW tracking and 3939MW solar

Please refer to the Exhibit 2, CAISO's 2011 Testimony http://www.caiso.com/Documents/2011-07-01_R10-05-006_Testimony.pdf