

California Independent System Operator

VIA ELECTRONIC MAIL

August 28, 2013

Matt Freedman Staff Attorney The Utility Reform Network 115 Sansome Street, Suite 900 San Francisco, CA 94101

Kevin Woodruff Woodruff Expert Services 1100 K Street, Suite 204 Sacramento, CA 95814

Re: ISO Response to the Second Set of Data Requests Related to Track 4 of The Utility Reform Network in Docket No. R.12 03 014

Dear Mr. Freedman and Mr. Woodruff:

Enclosed please find the California Independent System Operator's response to the second set of data requests served by The Utility Reform Network (TURN) in Track 4 of the LTTP proceeding.

Please feel free to call me if you have any questions.

Sincerely, /s/ Judith B. Sanders Judith B. Sanders Senior Counsel California Independent System Operator Corporation

Request No. 22.

Identify any and all reliability constraints – other than the "primary reliability constraint that drives the resource needs" of the overlapping outage of Sunrise Powerlink and Southwest Powerlink (21:3-8) – and the "Category" of each additional constraint, that also affected the

CAISO's modeling process and results for 2022 summarized in Table 10 (p. 21). Explain the impact, if any, that all such additional constraints had on the CAISO's results.

ISO RESPONSE TO No. 22.

Without looking at transmission upgrades, only the primary reliability constraint drives resource needs. As indicated on page 31 of the Track 4 testimony, the ISO is in the process of studying potential transmission solutions. The ISO will complete and publish those results through the ongoing ISO Transmission Planning Process. It is expected that these results will address the question above.

Request No. 12.

Identify any and all reliability constraints – other than the "primary reliability constraint that drives resource needs" of the overlapping outage of the Sunrise Powerlink and the Southwest Powerlink (18:17 21) – and the "Category" of each additional constraint that also affected the CAISO's modeling process and results for 2018 summarized in Table 9 (p. 19). Explain the impact, if any, that all such additional constraints had on the CAISO's results.

ISO RESPONSE TO No. 12.

Without looking at transmission upgrades, only the primary reliability constraint drives resource needs. As indicated on page 31 of the Track 4 testimony, the ISO is in the process of studying potential transmission solutions. The ISO will complete and publish those results through the ongoing ISO Transmission Planning Process. It is expected that these results will address the question above.