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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In The Matter of the Application of SAN DIEGO
GAS & ELECTRIC COMPANY (U 902 E) for a
Certificate of Public Convenience and
Necessity for the South Orange County
Reliability Enhancement Project

Application 12-05-020
(Filed May 18, 2012)

**COMMENTS OF FOREST RESIDENTS
OPPOSING NEW TRANSMISSION LINES (“FRONTLINES”)
ON THE PROPOSED DECISION**

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Pursuant to Rule 14.3 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Forest Residents Opposing New Transmission Lines (“FRONTLINES”) respectfully submits these comments on the Proposed Decision (“PD”) issued in Proceeding A.12-05-020 pursuant to the South Orange County Reliability Enhancement Project (“SOCREP” or “SOCRE Project”) proposed by San Diego Gas & Electric (“SDGE”). SOCREP was approved by the California Independent System Operator (“CAISO”) as part of the 2010-2011 Transmission Plan (“TP”), and throughout this proceeding, both CAISO and SDGE have been SOCREP proponents. Other parties (including FRONTLINES) recommended alternatives to SOCREP which CAISO and SDGE have not supported despite substantial evidence in the record demonstrating the superiority of these alternatives. FRONTLINES does not have extensive comment on the PD and merely clarifies certain misunderstandings regarding load loss limits imposed by various Planning Standards

THE NEW NERC STANDARD

Beginning on page 26, the PD discusses the new TPL-001-4 Standard, and on page 28 asserts that “the former footnote B that potentially provides an exemption for local area networks was removed. Under the new standard most single contingency events are now subject to the new footnote 12”. It also concludes, based on CAISO’s Opening Brief that, “FRONTLINES’ contention that footnote B allows for load loss after a single event is moot because the prior standard has been entirely replaced by NERC TPL-001-4 and “footnote B” no longer exists”. Finally, and based on the language of footnote 12 in TPL-001-4, the Alt PD establishes a load loss limitation of 75 MW under a single contingency event as the threshold for determining whether a SOCREP project alternative provides an acceptable level of reliability. There are a lot of issues “packed” into this discussion, and a number of the foundational elements within this discussion are at best, misconstrued law, and at worst, factually incorrect interpretation. FRONTLINES attempts to correct these errors in the following sections.

“Footnote b” in the Prior NERC Standard and Footnote 12 in the Current TPL-001-4.

The PD essentially draws a parity between “footnote b” and “footnote 12”, and fails to comprehend that they address two entirely different types of load loss, and that there is a significant “bright line” difference between them:

Footnote b pertains exclusively to consequential load loss that occurs in local networks and radially served areas with a single power source¹. As CAISO Witness Sparks confirmed on the stand, “if you only have one power source, you lose that source. You lose 500 megawatts... it's actually consequential load loss” [TR 355:22]. Footnote b does not address non-consequential load and it does not permit non-consequential load loss.² Footnote b is incorporated into the new TPL-001-4 standard via footnote b found on page 8 of TPL-001-4 which states “b. Consequential Load Loss as well as generation loss is acceptable as a consequence of any event excluding P0.” Although the new NERC standard does not impose a limit on consequential load loss, CAISO does through operation of its Planning Standard. Specifically through operation of Planning Standard #5, CAISO manifests its intent to “put a cap on the radial and/or consequential loss of load allowed under NERC standard TPL-001-4 single contingencies (P1)”, and it specifies a 250 MW load loss limit on all single contingency (P1) event³. However even application of a 250 MW load loss limit on SOC via CAISO’s standards is an utter contrivance because (as FRONTLINES Reply Brief explains in detail) SOC is not part of the BES, and is therefore not supposed to be under CAISO control or FERC jurisdiction or NERC standards. CAISO’s control of SOC is merely a “fig leaf” that is used to impose the CAISO Planning Standard on SOC and thereby justify expensive reliability upgrades that SDGE wants to be paid for and CAISO wants to control.

Footnote 12: Pertains exclusively to non-consequential loss or “load shedding” as clearly set forth in TPL-004-1. The non-consequential load loss addressed in Footnote 12 is entirely different from, and completely unrelated to, the consequential load loss addressed by footnote b (which exists in both the previous NERC standard and the current TPL-004-1 standard) . Footnote 12 in the new TPL-001-4 does not subsume Footnote b from the previous NERC standard because they address two entirely different load loss profiles. Footnote b pertains exclusively to consequential load loss, and footnote 12 addresses only non-consequential load loss. Footnote 12 limits non-consequential load loss to 75 MW. The current CAISO Planning Standard recognizes and incorporates this 75 MW limit as applicable only to non-consequential load.⁴ The CAISO Planning Standard applies a different limit to consequential load loss; as discussed above, CAISO’s consequential load loss limit is 250 MW.

The PD erroneously makes an “apples to oranges” comparison between the *consequential* load loss addressed by footnote b in both the previous and the current NERC standard and the *non-consequential* load loss addressed by footnote 12 in the new TPL-001-4 NERC standard, and it

¹ As FRONTLINES Witness Ayer states: “South Orange County load is a local network radially supplied, therefore, load loss is consequential. Footnote b allows load loss after a single event”. [TR1364 at 23]

² As SDGE Witness Jontry states “Footnote B is very clear in that non-consequential load loss is not permitted for that category of contingency -- for Category B contingencies.”[TR 81:10].

³ CAISO Planning Standard 5 – see explanation on page 14 of “California ISO Planning Standards – Effective April 1, 2015”

⁴ Page 17 of “California ISO Planning Standards – Effective April 1, 2015

equates the two in a way that obliterates the distinctions that separates them. As TPL-001-4 clearly states, Footnote 12 limits only *non-consequential* load loss after a single P1 contingency event; it does not limit *consequential* load loss after a single contingency event. The PD builds on this mistaken assumption by wrongly concluding that “Footnote 12” replaced “Footnote b” and that the 75 MW “short-term” *non-consequential* load loss limit imposed by Footnote 12 actually applies to *any* load loss, including *consequential* load loss.⁵ In an effort to clarify the errors encompassed in the PD, FRONTLINES offers the following:

- South Orange County is radially served by a 138 kV local network via a single connection to the CAISO grid, and other than the 230 kV bus and other equipment at Talega, SOC is not part of the “Bulk Electrical System” (“BES”) ⁶. However, because SOC is controlled by CAISO, it is subject to CAISO’s Planning Standards and, by extension, the NERC standards.⁷
- As a radially served system that is not part of the BES, load loss in the SOC 138 kV system is categorized as “consequential” load loss and, per CAISO Planning Standard #5, consequential load loss occurring as a result of any single (P1) contingency must not exceed 250 MW.⁸
- If SOC were part of the BES, then SOC load loss occurring after a single P1 contingency event could be categorized as “non-consequential” load loss, and therefore limited to 75 MW ‘near term’ in accordance with page 18 of CAISO’s current Planning Standard.

⁵ The PD derives these conclusions based on CAISO’s Opening brief stating “FRONTLINES contention that Footnote b” allows load loss is moot” because “Footnote 12 replaced Footnote b”. There are so many errors in this element of CAISO’s Opening Brief that it is difficult to know where to begin. First, as set forth above, Footnote 12 did not replace Footnote b. Second, FRONTLINES testimony regarding “footnote b” addressed only *consequential* load loss, and is therefore not pertinent to Footnote 12 (which pertains exclusively to non-consequential loss). As the transcript clearly shows, testimony by FRONTLINES Witness Ayer cited by CAISO that “Footnote b allows load loss after a single event” is explicitly limited to consequential load loss which occurs because SOC is a local network that is radially supplied. Witness Ayer’s actual testimony was: “Frontlines’ position is that South Orange County load is a local network radially supplied, therefore, load loss is consequential. Footnote B allows load loss after a single event,” [TR1364:23-27] and “A South Orange County system is a local network that is radially supplied. Therefore, loss, load loss in South Orange County, is consequential load loss. And it is not a violation of NERC standards to have consequential load loss as a result of a loss of an element” [TR 1361:10-16]. CAISO’s Opening Brief ignores all of this, and mendaciously misrepresents FRONTLINES actual testimony by judiciously carving out 7 words from an entire transcript and omitting all context and qualifications. The PD magnifies this fabrication perpetrated by CAISO by again misrepresenting FRONTLINES testimony. Incidentally, FRONTLINES definitively established that SOC is indeed a radially served local network that is not integrated into the CAISO grid by demonstrating that the SOC 138 kV system meets all five factors of FERC’s “Mansfield test” as applied by CAISO. [FRONTLINES Reply Brief page 4].

⁶ As set forth in Section 1 of FRONTLINES Reply Brief, SDGE and CAISO acknowledge that SOC is radially served from Talega, and CAISO has stated that even a total loss of the SOC 138 kV system would not affect the BES, therefore SOC is not part of the BES. An analysis of SOC via the 7 factor test established by FERC order 888 and the 5-factor “Mansfield” test demonstrates that SOC is a distribution system that is not part of the BES. Therefore, SOC should not be under the control of CAISO at all.

⁷ Page 4 paragraph 2 of FRONTLINES Reply Brief; CAISO Exhibit 503 on page 4 at 4.

⁸ Page 6 of CAISO’s Current Planning Standard effective April 15, 2015.

FRONTLINES is disappointed that SDGE and CAISO have “muddied the waters” of this proceeding and twisted the facts pertinent to NERC Standard requirements to such an extent that the Commission does not discern the substantial difference “consequential” load loss and “non-consequential” load loss, and therefore concludes that “load loss” of any kind is generally subject to the 75 MW “near-term” limit imposed by Footnote 12 of TPL-001-4. *Nothing could be further from the truth, and both CAISO and SDGE know it.*

FRONTLINES’ Reconductoring Alternative Complies with the 75 MW Threshold.

The record clearly shows that FRONTLINES’ Reconductoring Alternative fully complies with the 75 MW load loss “threshold” established by the PD. In fact, the record shows that FRONTLINES’ Reconductoring Alternative will not result in *any* SOC load losses under *any* of the P1, P2, and P3 contingency events governed by Footnote 12 in TPL-004-1. Moreover, FRONTLINES’ reconductoring alternative will avoid SOC load losses even during P4, P5, and P6 contingency events (formerly recognized as Category C events) in which TPL-004-1 specifically permits load loss in high voltage (“HV”) systems like SOC’s 138 kV systems. The ability of FRONTLINES’ Reconductoring Alternative to avoid all SOC load shed during Category B and Category C (or P1-P6) contingency events is proven by SDGE’s and CAISO’s modeled results (as detailed in FRONTLINES Initial and Reply Briefs. Therefore, FRONTLINES’ Reconductoring Alternative is NOT eliminated by application of the 75 MW load loss threshold for a single contingency event that is established by the PD, and the PD errs substantially in concluding otherwise. In fact (and as set forth in Section 2 of FRONTLINES’ Opening Brief), the only circumstances under which FRONTLINES’ Reconductoring Alternative would result in load shed are those which entirely remove Talega from service. FRONTLINES’ Reconductoring Alternative meets *all* the NERC and CAISO reliability requirements addressed in section 3.2 of the PD, and it does so with minimal environmental impact and at a fraction of the cost of SOCREP. Therefore, it should not be rejected by the PD “out of hand”.

RECOMMENDED MODIFICATION TO PAGE 39

FRONTLINES also recommends the following modification to page 39 of the PD

“According to FRONTLINES, there are two additions to the SOCRE Project that can address the risks of various contingency events that drop the entire South Orange County load. The first alternative (Trabuco Alternative) establishes a **new 230 kV transmission substation adjacent to the existing Trabuco** distribution substation that is served from both SONGS and the Santiago Substation...

Respectfully submitted;

/S/ Jacqueline Ayer
Jacqueline Ayer
on behalf of FRONTLINES

October 17, 2016