



City of Palo Alto Utilities Comments on the Draft 2021-2022 Transmission Study Plan

The City of Palo Alto Utilities (CPAU or the City) appreciates the opportunity to comment on the CAISO's 2021-2022 Draft Transmission Study Plan (Study Plan). The comments below address the Study Plan posted by the CAISO on February 18, 2021, and the presentation made by the CAISO during the February 25, 2021 stakeholder meeting.

As outlined in the CPAU comments on the CAISO 2020-2021 Draft Transmission Plan¹, dated February 22, 2021, over the years several proposals have been considered by the CAISO, PG&E, and CPAU. The fundamental reliability issues faced by CPAU have remained unaddressed. In particular, the location of the three transmission lines serving Palo Alto in a single corridor does not provide adequate service reliability because a single event can (and has) cause the loss of all three lines.² Although CPAU appreciates CAISO and PG&E's past co-operation on alternative ways to provide the desperately needed reliability improvement, it is important that alternative means to achieve the needed reliability be achieved now.

There is an urgent need to identify a long-term solution to reliably serve the CPAU load. One such solution could be the *Ames to Palo Alto 115kV* transmission project described in the above-mentioned CPAU comments. This project would potentially replace the need for the CAISO-approved *Ravenswood-Cooley Landing 115kV Reconductoring* project and is expected to have similar capital costs (~\$10-\$20 million). In other words, the *Ames-Palo Alto 115kV* project not only increases the capacity and reliability of the 115 kV system serving Palo Alto, but also provides a 115 kV interconnection outside the common corridor near the airport flight path. We, therefore, urge the CAISO to consider evaluating the *Ames to Palo Alto 115kV* transmission project and revisiting some of the previously-approved projects' needs and scope as part of the 2021-2022 transmission planning cycle.

CPAU appreciates the opportunity to comment on the Study Plan and acknowledges the significant effort of the CAISO staff in its development. We look forward to working with PG&E and the CAISO to develop needed transmission projects to address CPAU's long overdue reliability issues in the 2021-2022 transmission planning cycle.

¹ See <http://www.caiso.com/Documents/CPAUComments-2020-2021TransmissionPlanningProcess-Feb092021StakeholderCall.pdf>

² The last event occurred on February 17, 2010. The airplane caused all three lines to be interrupted and the outage lasted for 10 hours.





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