



3/11/2021

California Independent System Operator
250 Outcropping Way, Folsom, CA 95630

CAISO Transmission Planning:

Vistra appreciates the opportunity to submit an economic study request to the CAISO for consideration in the 2021-2022 Transmission Planning Process (TPP). We request the CAISO evaluate transmission expansions to alleviate congestion on the Moss Landing – Aguilas 230 kV line in the Greater Bay area. Vistra appreciates the CAISO's efforts and consideration of this request.

Background

In prior Transmission Planning Processes, the CAISO has identified congestion on the Moss Landing – Las Aguilas 230 kV line in the reliability assessment but adopted congestion management and nomograms as the mitigation solution for Moss Landing – Las Aguilas 230 kV line. In the economic assessment, the CAISO has identified congestion on this line as well, but at levels that have not spurred deeper analysis. We believe there is greater congestion that should be captured if modeling improvements are adopted to capture operational reality. In our separate comments submitted on the 2021-2022 TPP draft study plan, Vistra submits recommendations to more accurately capture operational reality of both transmission elements and the resources in the CAISO's models. If modeling improvements occur, then the congestion may be revealed in the results and merit further evaluation for an economic-driven project to alleviate the identified congestion.

Study Request

Vistra requests the CAISO conduct an economic study to identify solutions to relieve the transmission congestion on the Moss Landing – Las Aguilas 230 kV line in the Greater Bay Area to unlock multiple benefits including production cost savings, capacity benefits in local capacity requirements, and avoided renewable curtailment benefits among others. We suggest a transmission upgrade be modelled to evaluate the economic benefits that would result from re-rating the Moss Landing – Las Aguilas 230 kV line. We suggest modelling benefits achievable with a 800 MVA line upgrade.

Sincerely,

Cathleen Colbert

Director, CAISO Market Policy

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