

DOCKETED

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| Docket Number: | 15-IEPR-01 |
| Project Title: | General/Scope |
| TN #: | 206566 |
| Document Title: | California ISO Comments: 2015 Draft Integrated Energy Policy Report |
| Description: | N/A |
| Filer: | System |
| Organization: | California ISO |
| Submitter Role: | Public |
| Submission Date: | 11/10/2015 2:24:18 PM |
| Docketed Date: | 11/10/2015 |

Comment Received From: Jordan Pinjuv

Submitted On: 11/10/2015

Docket Number: 15-IEPR-01

2015 Draft Integrated Energy Policy Report

Additional submitted attachment is included below.

November 10, 2015

Andrew McAllister, Lead Commissioner
Robert B. Weisenmiller, Chair
California Energy Commission
Dockets Unit
Re: Docket No. 15-IEPR-01
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512

Via email docket@energy.ca.gov

Re: 2015 Draft Integrated Energy Policy Report

Dear Commissioner McAllister and Chair Weisenmiller:

The California Independent System Operator (ISO) submits the following comments concerning the *2015 Integrated Energy Policy Report*, specifically regarding the section on “Electricity Infrastructure in Southern California.”

As noted in our presentation at the August 17, 2015 workshop, the closure of the San Onofre Nuclear Generating Station (SONGS) has created reliability issues in the Los Angeles and San Diego Local Capacity Areas (LCAs). Managing the retirement of once-through cooled (OTC) resources presents additional challenges.

If resources authorized in the CPUC’s Long-Term Procurement Plan proceeding materialize and assumptions remain valid, supplies are adequate to meet reliability needs in the Los Angeles Basin and San Diego through 2020. However, if planned resources including additional achievable energy efficiency (AAEE) do not materialize, reliability in the Southern California area will be at risk. Ensuring reliability in the region may require extending OTC retirement dates and/or developing and licensing of projects that have already received initial permits and are likely to be developed only if contingencies are encountered.

The ISO has undertaken a study as part of the 2015-2016 Transmission Planning Process to address concerns regarding a potential 2021 resource deficit in the Los Angeles Basin LCA identified by the CEC using the Local Capacity Annual Assessment Tool. The results of this study will be publicly available in the draft transmission plan at the end of January 2016.

Thank you for the opportunity to submit these comments.

Sincerely,
/s/ Jordan Pinjuv

Jordan Pinjuv
Counsel