

May 1, 2017

Mr. Steve Berberich, CEO California Independent System Operator 250 Outcropping Way Folsom, CA 95630 via: <u>regionaltransmission@caiso.com</u>

Subject: Support for Smart Wires Transmission Solution to Manage Risk of Sycamore to Penasquitos Line Delay

Dear Mr. Berberich,

The California Wind Energy Association (CalWEA) strongly supports SDG&E's proposal to employ Smart Wires technology as a partial mitigation to manage the reliability risk associated with the delay of the in-service date of the Sycamore to Penasquitos 230-kV Line. Due to its quick-deployment time, Smart Wires' Power Guardian technology is the only means of addressing the reliability-criteria violation that has been identified and which the CAISO is obligated to address to assure grid reliability in the area. Even if more lead-time were available, however, it would be a far more cost-effective and flexible solution than all other alternatives. These favorable technology attributes promise to save California ratepayers many millions of dollars when deployed more broadly, and to facilitate cost-effective delivery of renewable resources to meet California's clean-energy needs.

For years, renewable resources that could cost-effectively meet California's policy goals have been stymied due to constraints in parts of the transmission system controlled by the CAISO and its neighboring Balancing Areas. Until recently, CAISO planners and operators have mainly had costly and long-lead-time solutions, such as the addition of new transmission facilities, available to them to address identified transmission constraints. As a result, many renewable resource projects have proven uneconomical and perished on the vine. Smart Wires' Power Guardian technology, developed and owned by a Californiabased company, offers a new approach to address many types of transmission constraints May 1, 2017 Page 2

at a substantially lower cost, with substantially lower environmental impacts, and with much shorter deployment timelines.

CalWEA's Technical Director, Dr. Dariush Shirmohammadi, who has also served as the Director of Regional Transmission at CAISO as well as a transmission planner at the Pacific Gas and Electric Company and Ontario Hydro (now Hydro One) is familiar with the Power Guardian technology and considers it to be a major breakthrough for solving the majority of transmission constraints that get in the way of delivering renewable energy resources located both within and outside of the state to California load centers. CalWEA is therefore excited to see this promising technology deployed and demonstrated by SDG&E to demonstrate its many benefits for future potential application across the CAISO grid and elsewhere to serve as both short- and long-term solutions to transmission constraints faced by new energy resources.

Please do not hesitate to call on me or Dariush if you have further questions.

Sincerely,

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cc. Dr. Keith Casey Mr. Neil Millar