



IMPERIAL IRRIGATION DISTRICT

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CALIFORNIA STATE ASSEMBLY COMMITTEE ON UTILITIES AND COMMERCE JOINT LEGISLATIVE COMMITTEE ON EMERGENCY MANAGEMENT

JOINT OVERSIGHT HEARING ADDRESSING GRID VULNERABILITIES: SEPTEMBER 8, 2011 SOUTHWEST POWER OUTAGE

POST-HEARING COMMENTS OF IMPERIAL IRRIGATION DISTRICT November 7, 2011

Imperial Irrigation District ("IID") would like to thank the Assembly Committee on Utilities and Commerce and the Joint Legislative Committee on Emergency Management (collectively "Committees") for the opportunity to testify at the Joint Oversight Hearing held in San Diego on October 26, 2011. As an affected system on September 8, 2011, IID had nearly 145,000 customers that lost power. Based upon the information available at this time, IID has determined that its System Operator acted appropriately in response to the overloads that occurred rapidly on IID's Transmission System following the trip of the Hassayampa-North Gila line operated by Arizona Public Service Company ("APS") and that IID's facilities and equipment, in turn, tripped automatically, as designed, to protect the transmission system from harm. Along with its neighbors, IID is committed to preventing a recurrence of this loss of power. Therefore, IID is working diligently with the Joint Task Force – comprised of the California Independent System Operator Corporation ("CAISO"), San Diego Gas & Electric Corporation ("SDG&E"), Southern California Edison Company ("SCE"), Comisión Federal de Electricidad ("CFE"), APS, Western Area Power Administration ("WAPA"), Western Electricity Coordinating Council ("WECC") and IID – to determine the underlying cause or causes of the September 8 disturbance. IID is also cooperating with inquiries undertaken by federal and state regulators. Whatever the final outcome of these efforts, IID is determined to take whatever steps are necessary to ensure that a similar occurrence does not happen again.

IID is concerned that some of the testimony at the Joint Oversight Hearing may have resulted in certain misunderstandings about IID's Balancing Authority ("BA") area and the operation of its system. Through these comments, IID seeks to clarify the record in this proceeding and provide the Committees with further insight into IID's system and its operations, as well as, IID's coordination and communication with adjacent balancing authorities.

IID serves approximately 145,000 customers in Imperial County and parts of Riverside County with a peak load of approximately 1000 MW. IID owns and operates over 1400 miles of transmission lines. IID is a certified BA pursuant to the applicable procedures of the North American Electric Reliability Corporation (“NERC”) and the WECC. IID’s transmission system has two interties to the west with CAISO (SCE and SDG&E) and interties to the east with APS and WAPA.

As a transmission operator (“TOP”) and WECC-certified BA, IID is subject to all federally-mandated reliability standards imposed upon TOPs and BAs. These include coordination and communication with adjacent BAs and transmission operators and coordination and communication with the WECC Reliability Coordinator (“RC”). IID is also subject to numerous mandatory reliability standards pertaining to operation and maintenance of its transmission system. Compliance with these reliability standards is periodically audited by WECC. In its most recent audit in December 2010 IID received a perfect score with no findings of reliability standard violations.

Applicable reliability standards and prevailing practice among and between BAs require that substantial data be shared with neighboring systems. Indeed, data sharing practices pre-date the creation of federally-enforceable reliability standards. In fact, the CAISO has significant access to real time operational data from IID. Testimony by representatives from the CAISO during the Joint Oversight Hearing suggested that the CAISO did not have “visibility” into IID system prior to or during the September 8 disturbance. Clarification or correction of record is necessary because, in fact, IID began providing real-time data through telemetry to the CAISO on July 29, 2003. Initially, the real-time data provided was for certain 230 kV and 161 kV bulk electric system components on the IID system. Between 2003 and early 2011, the CAISO received additional telemetry data of the IID system to bring the total to thirty (30) different values on the IID transmission system. More recently, on April 18, 2011, the CAISO requested telemetry for seventy-nine (79) additional values on IID’s transmission system. The CAISO request was fulfilled by IID on July 6, 2011, prior to the disturbance, which provided the CAISO with visibility of virtually the entire IID bulk electric transmission system, including IID’s interties with other utilities. The 109 values which are provided to the CAISO include circuit breaker status, voltage readings and how much power is flowing across power system elements such as transformers and lines located in IID’s Coachella Valley, Ramon, Midway, Highline, Niland, Pilot Knob and the El Centro Substation facilities.

IID provides an even more extensive list of IID telemetry data to the RC. The RC receives notification of all scheduled outages for equipment comprising the IID bulk electric system (BES), well in advance of the outage. All outages of IID BES components, including forced outages, are reported to and coordinated with the RC. Unscheduled outages and unusual conditions on the bulk electric system are reported to the RC with periodic updates made throughout the event.

In addition to the real-time data IID provides to the CAISO and RC, IID also provides detailed transmission planning data to adjacent BAs and TOPs through its participation in subregional planning groups such as the California Transmission Planning Group (“CTPG”) and the Southwest Area Transmission Planning Group (“SWAT”). IID submits detailed information and data about its transmission system and future transmission plans to these groups which are incorporated into the base cases used by transmission planning entities in these regions. IID also submits this information and data to WECC to be used for state- and west-wide transmission planning purposes.

Any suggestion that the CAISO had no visibility into IID’s transmission system on September 8, 2011 is simply inaccurate. Specifically, at the time of the disturbance, CAISO had telemetry to 109 values on IID’s system giving it visibility into virtually all of IID’s bulk transmission system. IID is also subject to the federal mandatory reliability standards, including those relevant to communication with adjacent BAs, transmission owners and the WECC reliability coordinator. IID takes its role as a BA very seriously and fully understands the need for coordination and communication between BAs.

IID appreciates the opportunity to submit these post-hearing comments. IID will continue to work with the Joint Task Force and will fully cooperate with the Joint Inquiry at FERC and NERC to determine what caused this event and any remedial steps necessary to prevent a future occurrence.