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**DOCKET**  
**09-AFC-4**

DATE 02/02/11

RECD. 02/03/11

Hi Pierre,

I have replaced Rick Buckingham and am attending CEC's OGS workshop on behalf of CDWR. As you may know, CDWR's Banks Pumping Plant (Delta Pumps) is tied to the Contra Costa - Tesla 230 kV line. In addition, CDWR's South Bay Pumping Plant has a maintenance feeder line tied to Banks Pumping Plant. Furthermore, South Bay Pumping Plant is under construction to replace its existing service from PG&E's Herdlyn - Livermore 60 kV line with service directly from Banks Pumping Plant via a new 69 kV line, estimated in-service by summer 2011. Banks is critically situated in the Sacramento-San Joaquin Delta, supplying water into the beginning of the California Aqueduct.

PSA Part B, Section 5, describes that the developer plans to reconnector the Contra Costa - Delta Pumps 230 kV line. My concern relates to how the developer will ensure that construction will not impact Banks during project construction or ongoing operations. We would want assurance that the Tesla - Delta section of the line would remain in continuous service during construction to supply Banks and South Bay Pumping Plants. Even so, this would create a single source connection for Banks and South Bay, therefore, we would also want assurance that there will be no load restrictions imposed upon our plants. Other areas of discussion include what the power plant will do to the local reliability area (Greater San Francisco Bay Area) and if the power plant allows another plant to shut down (net generation increase). From what I gathered, construction is estimated to begin in Q1 2011 and end in Q4 2013; I would be interested in seeing any submitted schedules and details for the reconnectoring. I am just beginning to review the documents now so any thoughts you have would be appreciated.

With regard to ISO operations upon completion of the project, we are also questioning if this would result in a reduction of the parameter tuning effectiveness factor for Banks/South Bay in the scheduling runs at the CAISO. It is my understanding that CAISO currently assigns a high effectiveness factor to CDWR's Delta load, resulting in the likelihood that the load will be among the first to be dropped.

Much thanks,

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