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*Comment Received From: Jamie Asbury
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Comments of Imperial Irrigaton District

Additional submitted attachment is included below.



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July 14, 2021

California Energy Commission
Docket Office, MS-4
Re: Docket No. 20-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Subject: The Imperial Irrigation District (IID) Comments on the California Energy Commission Docket No. 21-IEPR-04: Energy Reliability – Summer 2021 Electric and Natural Gas Reliability

Dear Commissioners:

On July 8, 2021 and July 9, 2021, the California Energy Commission (CEC) conducted a joint agency workshop along with the California Public Utilities Commission (“CPUC”) and the California Independent System Operator (“CAISO”)(collectively “Agencies”) to address Summer 2021 Electric and Natural Gas Reliability. The July 9, 2021 workshop included considerable discussion of gas system reliability and its relationship to electric system reliability. The workshop identified complex issues resulting from efforts to decarbonize the electric grid, resulting in the role of natural gas evolving from fueling baseload generation to meeting ramping needs. The discussion revealed that natural gas reliability has not traditionally been a focal point of the CEC’s IEPR process, but several commissioners noted a need for robust natural gas planning in coordination with electric grid planning.

The Imperial Irrigation District (IID) appreciates the opportunity to submit comments following the joint agency workshop for consideration by the Commission as it addresses the need for coordinated planning amongst the Agencies and natural gas and electric utilities.

Summary. IID’s comments are summarized here and expanded on further below:

1. When electric utilities plan their resources to meet consumer needs during peak summer demand periods, they need to know if they will be able to receive natural gas to fuel electric generation when needed.

2. Natural gas utilities should be required to provide advance notice and transparent information regarding pipeline maintenance activities in time for electric utilities to incorporate gas system limitations in their resource planning.
3. Routine maintenance and inspections should be prohibited during periods of peak electric demand.

Background. IID operates the third largest balancing authority area in the State of California, and provides electric power to more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego counties. As the sixth-largest utility in California, IID controls more than 1,100 megawatts of energy derived from a diverse resource portfolio that includes its own generation, and long- and short-term power purchases. IID plans its system to meet significant summer electric load, as the average summer high temperatures in IID's service territory regularly exceed 100 degrees.

Summer Readiness. Following the rolling outages during Summer 2020, considerable efforts were made by the Agencies in coordination with electric utilities to prepare for the Summer of 2021. New market rules were adopted placing restrictions on outages of electric generation facilities, limiting discretion of the market operator and requiring replacement resources for outages that occur during peak demand hours. It is essential that similar considerations be implemented for natural gas facilities, particularly during the summer and winter periods.

SoCalGas Planned Gas Curtailments. The reliability assessment discussed by SoCalGas during the July 9 workshop presumed Line 4000 is out of service through September, Line 2001 is out for one week in May for inspections, and Line 5000 is unavailable for one week in July for inspections.¹ SoCalGas's worst case scenario included Line 4000 staying out of service through the winter, Line 2001 remaining out of service through May, and complications from the in-line inspection of Line 5000 resulting in an outage for the remainder of July, and possibly October.²

Communication and Coordination Issues. IID is concerned that two of the three maintenance outages SoCalGas included in its assessment were not communicated to customers or the Agencies in a timely manner.

Customers did not receive notice of the Line 5000 inspection outage until a July 1, 2021 critical notice was posted on SoCalGas's Envoy system.³ That notice indicated dispatchable Electric Generators would be curtailed during the period of July 15-19, 2021. The notice indicated the curtailment could be shorter or longer. The July 9th presentation revealed "longer" could mean the remainder of July, as well as additional curtailments in October.⁴ IID was very concerned to learn of the planned July 15th-19th curtailment on

¹ <https://efiling.energy.ca.gov/getdocument.aspx?tn=238755> ("SoCalGas Presentation"), Slide 8.

² SoCalGas Presentation, Slide 8.

³ <https://scgenvoy.sempa.com/#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D1%26rand%3D370>

⁴ SoCalGas Presentation, Slide 8.

July 1, long after IID had planned its resources for the summer. While IID appreciates SoCalGas efforts to provide access to natural gas for IID during the inspection event, IID remains faced with unnecessary uncertainty and risk.

Further, the CPUC summer assessment presentation immediately following SoCalGas's assessment revealed that the only outage the CPUC was aware of when making its reliability assessment was the Line 4000 maintenance outage.⁵ The lack of awareness of other planned curtailments indicates an apparent lack of communication of SoCalGas maintenance plans with the CPUC.

It is apparent notice could have been provided earlier. The curtailment events were not emergency repairs. The May and July curtailments were for "compliance inspections." SoCalGas knew it needed to do the inspections and planned for them, but despite apparently knowing of them in time for its summer assessment, SoCalGas did not provide advance notice of the events to customers and the Agencies.

Inspections and non-critical maintenance must be avoided during the peak electric demand summer months. SoCalGas's presentation indicated SoCalGas coordinates its outages with electric generation operators, and tries to schedule outages during periods of low demand except for identified safety issues or regulatory requirements.⁶ IID asserts the communication of the July inspections failed to meet this standard. Putting an essential line at risk of curtailment for two weeks in July for a planned inspection with only two weeks advance notice to customers creates unnecessary risk of reliability events for electric utilities and their customers. In addition, there are economic consequences for all gas and electric consumers when supply is constrained during periods of high demand. IID urges the Commission to consider implementing a formalized process in which natural gas providers submit a proposed schedule for pipeline maintenance outages that includes a lead time of nine months prior to the outage. This preplanning will allow electricity generators sufficient time to adjust in response to curtailments. Eliminating last-minute or short-term notification except in case of true emergency will result in a more reliable system.

IID submits that the coordinated robust planning of gas and electric utility operations requires natural gas utilities to provide transparent, advance notice of all planned maintenance curtailments. The notice needs to be in time for electric utilities to plan their resources to meet consumer needs during peak summer demand periods. In addition, there should be prohibitions on planned maintenance and inspections during the summer peak electric load period.

⁵ <https://efiling.energy.ca.gov/getdocument.aspx?tn=238732> ("CPUC Assessment") Slide 6, and accompanying discussion.

⁶ SoCalGas Presentation, Slide 10.

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Conclusion. IID applauds the Commission for scrutinizing the changing natural gas needs of the evolving electric grid. IID appreciates the Commission's recognition of the need for coordinated planning, and asks that the Commission consider IID's observations regarding the need for advance notice of maintenance curtailments on the natural gas system, as well as the need to avoid such curtailments during the summer peak electric demand months.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Martinez". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Enrique B. Martinez
General Manager