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Comment from Peak Reliability - Docket 16-IEPR-02

Peak Reliability's independent studies confirm those of CAISO and LADWP that the system can reliably maintain electric supply, assuming all facilities in service, through a combination of imports and minimum natural gas units served by SoCalGas system to serve the LA Basin load. However, our collective studies also indicate for winter 2016-2017 that if a particular transmission contingency occurs during a 1 in 10 year winter peak load condition and 100% curtailment of gas fired generation, the system may not be able to operate in a reliable post-contingency state (for the next major transmission outage) without the need for load shedding. Because the particular contingency of concern may be considered Critical Energy Infrastructure Information, we will not disclose publicly the name of the facilities, but that information has been shared amongst CAISO, LADWP, and Peak Reliability. Peak Reliability makes this comment to raise awareness of the risks that still exist for winter operations.