

DOCKETED	
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Balancing Authority of Northern California (BANC) Comments

*SB 100 Workshop
Redding, CA*

October 25, 2019



BALANCING AUTHORITY OF NORTHERN CALIFORNIA

A JOINT POWERS AUTHORITY BETWEEN

Modesto Irrigation District | City of Redding | City of Roseville | Sacramento Municipal Utility District | City of Shasta Lake | Trinity Public Utility District

6001 S Street MS D109 Sacramento CA 95852-1830

WWW.THEBANC.ORG

BANC Background

- Group of N. CA POU's
 - Members
 - Modesto Irrigation District
 - City of Redding
 - City of Roseville
 - Sacramento Municipal Utility District
 - Trinity Public Utilities District
 - City of Shasta Lake
 - Contract Relationships
 - WAPA – SNR: 230kV system that interconnects the Central Valley Project (CVP)
 - Transmission Agency of Northern California (TANC): 500kV California-Oregon Transmission Project (COTP)



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BANC Background (cont'd)

- Joint Powers Agency formed by its members
- Provides Balancing Authority Area services to its members and contracted parties and Planning Coordinator services to members requesting the service
 - Complies with applicable NERC Reliability Standards
- Serves as the EIM Entity to facilitate participation in CAISO EIM for those within the BANC BAA
 - Phase 1 EIM participation (SMUD Only) – April 3, 2019
 - Phase 2 EIM participation (remaining members + WAPA) – April 2021
- ~5000 MW Peak Load BA
 - 16th largest in West; 3rd largest in CA



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BANC Footprint



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Comments on SB100

- BANC members = POU load serving entities – fiduciary responsibility to balance customer/owner expectations
 - Safety
 - Reliability
 - Affordability
 - Environmental Sustainability
- BANC and its members support SB100 goals
 - Current approach focused around “zero” net carbon, with adjustments based upon cost effective, proven technologies
 - Need clear articulation of near-term vs. long-term goals
 - 100% Renewables/“zero” carbon/ “zero” net carbon
 - Each can have a very different impact on how reliable operations are met



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Comments on SB100 (2)

- **BANC as BAA is focused on reliability**
 - Basic expectation of our customer-owners
 - Inherent in NERC defined role of BAA
 - NERC standards demand and require compliance
 - Results in conservative approach to ensuring reliable BAA operations
 - Balancing load and resources in the BAA footprint requires responsive resources to meet ramping and real-time fluctuation requirements
 - Promotes diverse resource mix
 - Promotes use of proven resources



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Comments on SB100 (3)

- Considerations Going Forward
 - Need a clear, flexible transition plan
 - Avoid frequent changes in direction
 - Changes in direction based upon proven technology and sound decisions
 - New technology proven and in place before old technology is abandoned
 - Diverse resource mix
 - Hydro has to count
 - Proper mix of in-state and regional resources
 - Need to factor in potential CAISO and PNW capacity shortfalls
 - Validated Demand Response and Distributed Generation
 - Mix of short-term and long-term storage essential to transition
 - Need to plan for worst case scenarios (weather/fire)
 - Expansion of EIM and development of EDAM part of solution



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