

FRONTLINES DATA REQUEST #5 TO THE NEVADA HYDRO COMPANY

GENERAL QUESTIONS REGARDING TEVS/LEAPS

1) At the point of interconnection with the SCE system, please describe what (if any) differences there are between the engineering, infrastructure and construction costs required to complete the TEVS/SCE interconnection addressed by the CPCN application and the engineering, infrastructure and construction costs required to complete the LEAPS/SCE interconnection addressed by TNHC's LGIA with SCE. In other words, in the event TEVS is approved and built, what additional SCE and TEVS system modifications beyond what TNHC proposes with their CPCN applications will be required to interconnect LEAPS in the future?

2) At the point of interconnection with the SDGE system, please describe what (if any) differences there are between the engineering, infrastructure and construction costs required to complete the TEVS/SDGE interconnection addressed by the CPCN application and the engineering, infrastructure and construction costs required to complete the LEAPS/SDGE interconnection addressed by the LGIA between TNHC and SDGE that is now in progress. In other words, in the event TEVS is approved and built, what additional SDGE and TEVS system modifications beyond what TNHC proposes with their CPCN application will be required in the future to interconnect LEAPS?

REGARDING WITNESS VENGALATOS' TESTIMONY

3) Pursuant to Rule 10.3 of the Commission's Rules of Practice and Procedure, FRONTLINES requests a complete set of the input and output files from the PLEXOS analysis for the Base Case, TEVS Case, and TEVS+LEAPS Case. Please provide this information in a formattable format such as Excel (i.e not pdf).

4) Please identify the quantity of distributed generation (in MW) in SDGE's load area that was assumed by witness Vengalatos in the Base Case, TEVS Case, and TEVS+LEAPS Case PLEXOS analyses.

5) Does witness Vengalato agree with the CAISO's conclusion that Otay Mesa's NQC should be increased from 573 to 603? (see <http://www.aiso.com/2776/2776d263430a0.pdf>). If not, why not? If so, why isn't this value considered in witness Vengalatos' PLEXOS model rather than the 530 MW identified in Exhibit 3?

6) Pursuant to Rule 10.4 of the Commission's Rules of Practice and Procedure, FRONTLINES requests access to witness Vengalatos' PLEXOS model in order to run a proper Base Case analysis which includes the Path 42 Upgrades and new Imperial Valley generation as well as 180 MW of distributed solar generation produced in SDGE's service territory. FRONTLINES makes this request because 1) the Path 42 upgrades have been approved by CAISO, thus applying witness Vengalatos' criteria for including CAISO-approved transmission projects in the Base Case demands that witness Vengalatos' modeling results properly reflect Path 42 upgrades in the Base Case; and 2) the Commission-approved SDGE SPVP program (D 109.09.016) will bring SDGE's in-situ solar

generation level to 180 MW by 2015, thus applying witness Vengalatos' criteria for including "key driver" generation projects for 2015 in the Base Case, the TEVS Case, and TEVS+LEAPS Case demands that witness Vengalatos' modeling results properly reflect this level of distributed generation in SDGE's service territory. This request relates to FRONTLINES position that 1) TEVS does not provide the benefits claimed by witness Vengalatos, and that including the Path 42 upgrades in the TEVS but not the Base Case improperly ascribes the Path 42 upgrade benefits to TEVS; and 2) Excluding generation in SDGE's service territory improperly skews the modeling results to indicate local capacity demand that is not actually necessary. In the event witness Vengalatos provides FRONTLINES with the model to satisfy this request (in accordance with Rule 10.4(d)(2)), FRONTLINES also requests all associated documentation identified in Commission Rule 10.3(a)(3) as well as the information identified in Commission Rule 10.4.(b).

7) Pursuant to Rule 10.4 of the Commission's Rules of Practice and Procedure, FRONTLINES requests access to witness Vengalatos' PLEXOS model in order to run Base Case, TEVS Case, and TEVS+LEAPS Case analyses which properly address Encina generation in a manner that is consistent with CAISO's 2011 Transmission Plan. In her analysis, witness Vengalatos assumed existing generation known as Encina 1, 2, and 3 would be removed from service by 2015 and *not* replaced with the proposed Carlsbad Energy Project. This is inconsistent with CAISO's analysis of SDGE's system in 2015 that is presented in CAISO's draft 2011 Transmission Plan and which assumes all Encina generation units are operational (see pgs 196-197). In other words, witness Vengalatos' PLEXOS model results do not include important "key driver" generation projects assumed by CAISO for 2015, and therefore do not meet the basic criteria that witness Vengalatos established for the PLEXOS model in her testimony (see Page 7 line 6). FRONTLINES makes this request to provide a correct assessment of SDGE's 2015 transmission requirement that properly includes "key driver" generation in the Base Case, TEVS Case, and TEVS+LEAPS Case analyses. This request relates to FRONTLINES position that TEVS does not provide the benefits claimed by witness Vengalatos, and that by intentionally excluding generation which CAISO considers to be a "key driver" for 2015 improperly ascribes unrealistic benefits to TEVS. In the event witness Vengalatos provides FRONTLINES with the model to satisfy this request (in accordance with Rule 10.4(d)(2)), FRONTLINES also requests all associated documentation identified in Commission Rule 10.3(a)(3) as well as the information identified in Commission Rule 10.4.(b).

REGARDING WITNESS DEPENBROCK'S TESTIMONY

8) Pursuant to Rule 10.3 of the Commission's Rules of Practice and Procedure, FRONTLINES requests a complete set of the input and output files from all modeling analyses conducted by witness Depenbrock to support his TEVS reliability testimony related to SDGE system N-1, G-1, and N-1/G-1 conditions. Please provide this information in a formattable format such as Excel (i.e not pdf).