Path 26 Constraint

Background

- D.07-06-029 adopted the Path 26 constraint beginning with the 2008 RA compliance year due to reliability concerns.
- In 2017, PG&E proposed to remove the Path 26 constraint, arguing the constraint is no longer needed and is unfair.
- D.17-06-027 ordered a working group to study the Path 26 constraint.
- Energy Division analysis showed that Path 26 would generally not be exceeded except for three summer months in the N-S direction.

Proposal: Remove Path 26 Constraint

- The Path 26 allocation has not been fully used in either direction in recent years.
- The scenarios under which the North-to-South Path 26 allocation would be violated appear unlikely, based on Staff's analysis.

January Used and Unused Allocations 2017 to 2019

Direction	Metric	2017 Month Ahead	2018 Month Ahead	2019 Month Ahead
South to North	Total Path 26 Allocation	3,976	4,194	3,879
	Used Allocation	572	757	685
	Unused Allocation	3,405	3,437	3,194
North to South	Total Path 26 Allocation	3,275	3,419	3,528
	Used Allocation	2,132	1,863	1,935
	Unused Allocation	1,143	1,555	1,593

August Used and Unused Allocations 2017 to 2019

Direction	Metric	2017		2018		2019
		Year Ahead	Month Ahead	Year Ahead	Month Ahead	Year Ahead
South to North	Total Path 26 Allocation	3,976	3,976	4,194	4,194	3,879
	Used Allocation	1,770	1,538	1,107	1,858	794
	Unused Allocation	2,206	2,438	3,087	2,336	3,085
North to South	Total Path 26 Allocation	3,275	3,275	3,419	3,419	3,528
	Used Allocation	1,496	2,406	2,055	2,732	1,769
	Unused Allocation	1,779	869	1,364	686	1,758

Requirements, Available Resources, and Average Imports North of Path 26

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020 PGE TAC Forecast and System Requirements (Forecast * 1.15)												
2020 Forecast (MW)	14,549	14,214	13,306	14,319	16,489	19,262	20,254	19,531	18,589	15,508	13,841	14,944
2020 Requirements (MW)	16,731	16,346	15,302	16,467	18,962	22,151	23,292	22,461	21,378	17,835	15,917	17,185
Available MW in North of Path 26 (2019 NQC with Updated ELCC Values)												
Total Available MW	22,499	22,528	23,200	23,064	23,266	24,104	24,229	23,659	22,706	22,283	22,417	22,463
Capacity That Will Be Procured Regardless (MW)												
Bay Area Local Requirement	4,461	4,461	4,461	4,461	4,461	4,461	4,461	4,461	4,461	4,461	4,461	4,461
Other PG&E Local Reqmt.*	5,387	5,387	5,387	5,387	5,387	5,387	5,387	5,387	5,387	5,387	5,387	5,387
Non-Local UOG	3,565	3,517	3,451	3,023	3,155	2,685	3,208	3,248	2,860	3,306	3,329	3,374
Non-Local Solar	73	55	327	273	291	564	709	491	254	36	36	-
Non-Local Wind	55	47	110	98	98	129	90	82	59	31	47	51
Non-Local DR	53	53	55	62	90	107	108	103	98	75	52	56
Total	*13,594*	*13,520*	*13,791*	*13,304*	*13,482*	*13,333*	*13,963*	*13,772*	*13,119*	*13,296*	*13,312*	*13,329*
Imports North of Path 26 (MW)												
Average Imports (2017-2018)	707	720	720	749	944	852	1,573	1,733	1,541	940	940	897
2019 North Max Import Capability after Step 2	3,354	3,354	3,354	3,354	3,354	3,354	3,354	3,354	3,354	3,354	3,354	3,354

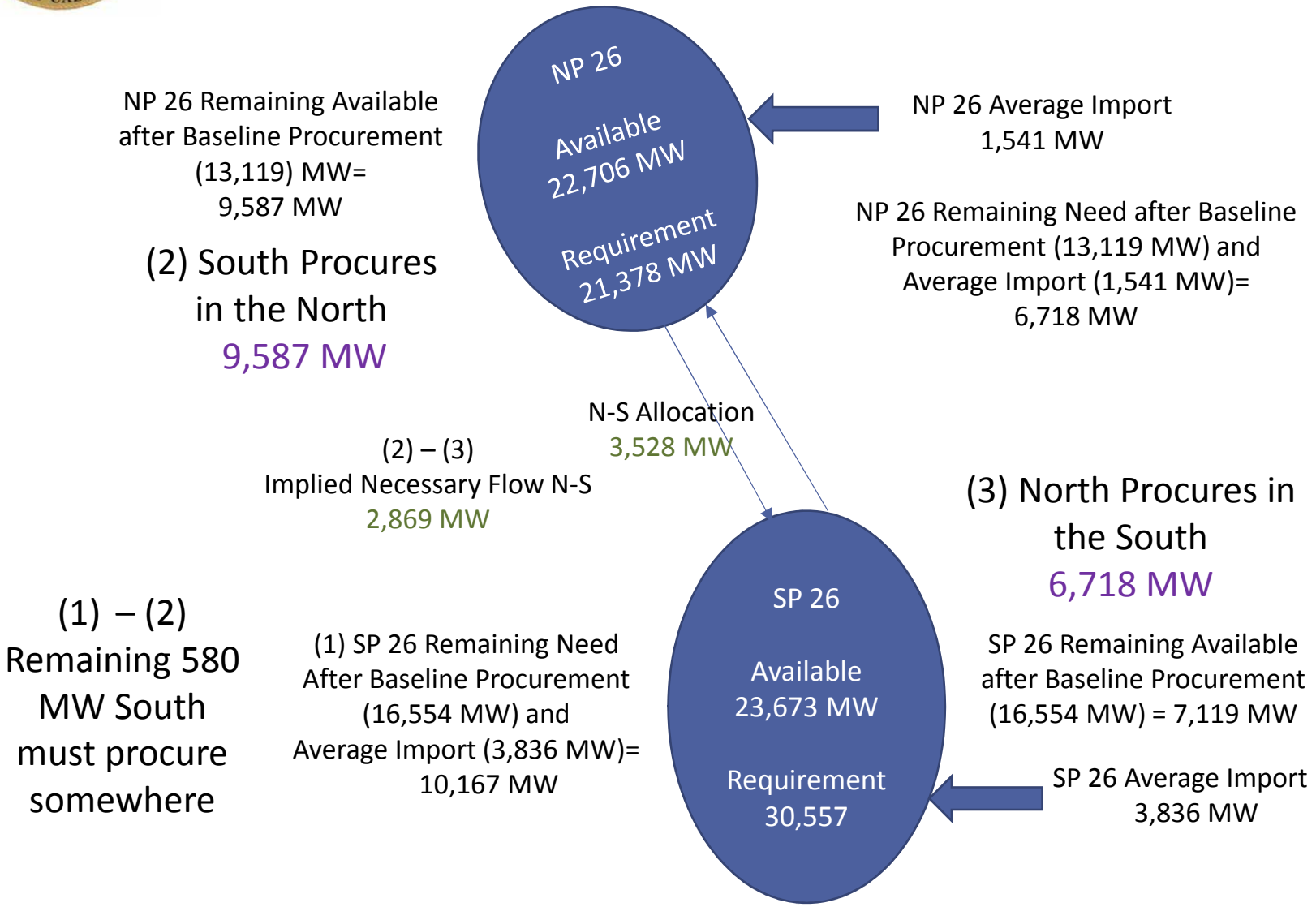
Requirements, Available Resources, and Average Imports South of Path 26

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020 SCE and SDG&E TAC Forecast and System Requirements (Forecast * 1.15)												
2020 Forecast (MW)	17,064	16,563	16,635	18,022	19,626	21,840	24,258	25,304	26,572	21,414	17,759	17,628
2020 Requirements (MW)	19,623	19,048	19,130	20,726	22,570	25,116	27,897	29,099	30,557	24,626	20,423	20,272
Available MW in South of Path 26 (2019 NQC with Updated ELCC Values)												
Total Available MW	22,862	22,765	24,386	24,119	24,265	25,660	25,712	24,814	23,673	22,381	22,700	22,682
Capacity That Will Be Procured Regardless (MW)												
LA Basin Local Requirement	8,116	8,116	8,116	8,116	8,116	8,116	8,116	8,116	8,116	8,116	8,116	8,116
Big Creek/Ventura Local Reqmt.	2,614	2,614	2,614	2,614	2,614	2,614	2,614	2,614	2,614	2,614	2,614	2,614
SD-IV Local Requirement	4,026	4,026	4,026	4,026	4,026	4,026	4,026	4,026	4,026	4,026	4,026	4,026
Non-Local UOG	429	429	430	436	447	456	446	440	432	430	430	429
Non-Local Solar	218	164	981	818	872	1690	2126	1472	763	109	109	-
Non-Local Wind	447	383	894	798	798	1054	734	670	479	255	383	415
Non-Local DR	82	102	101	117	126	135	135	141	124	104	119	84
Total	*15,932*	*15,834*	*17,162*	*16,925*	*16,999*	*18,091*	*18,197*	*17,479*	*16,554*	*15,654*	*15,797*	*15,684*
Imports South of Path 26 (MW)												
Average Imports (2017-2018)	2,141	2,204	1,896	2,531	2,396	2,209	2,935	3,808	3,836	2,515	2,402	2,550
2019 South Max Import Capability after Step 2	6,639	6,639	6,639	6,639	6,639	6,639	6,639	6,639	6,639	6,639	6,639	6,639

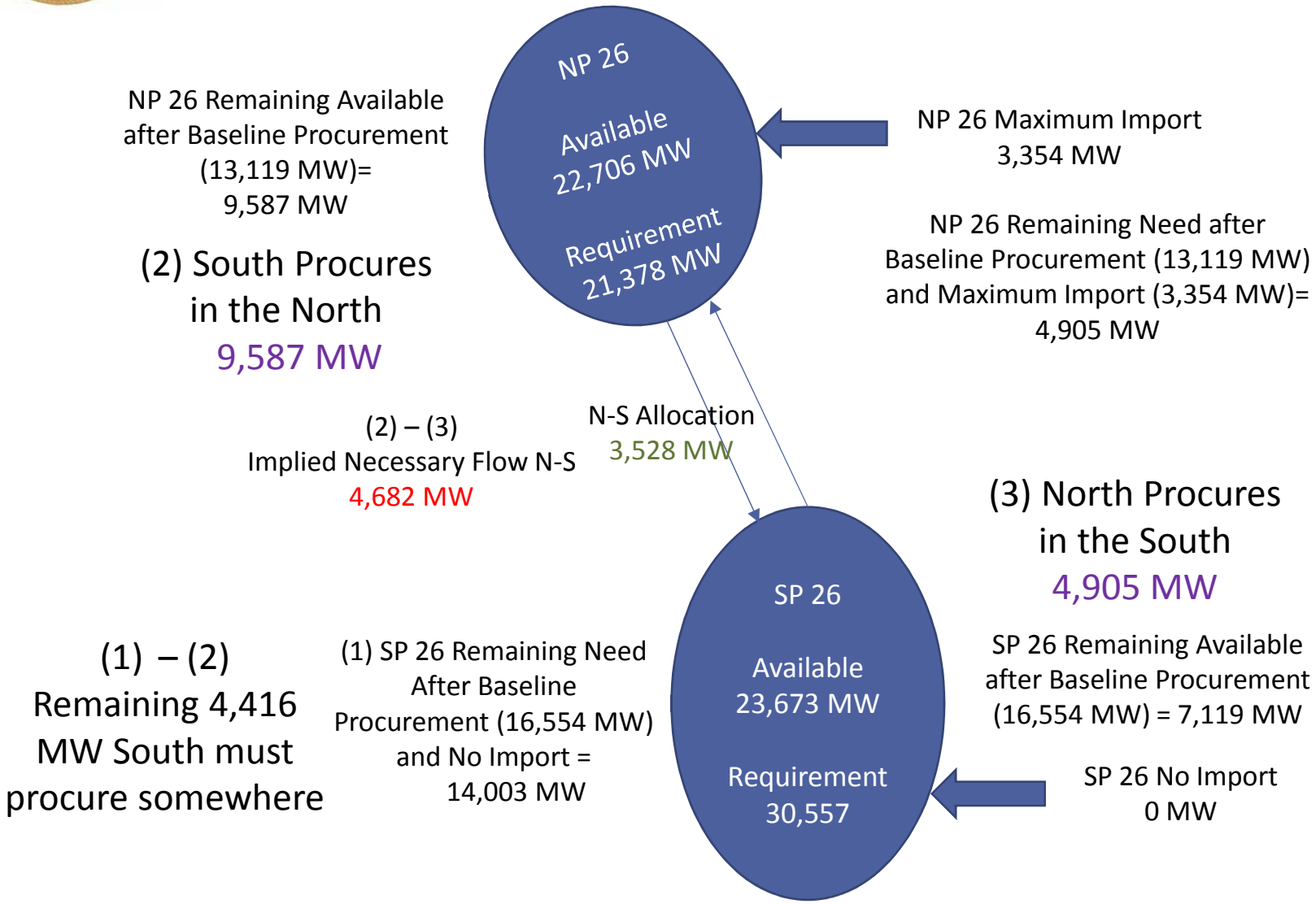
Base Assumptions – September

Base Assumptions		
(A)	Requirement South of Path 26	30,557
(B)	Available MW South of Path 26	23,673
(C)	Baseline MW Procured South of Path 26 by LSEs Serving Load South of Path 26	16,554
(D)	Remaining Available MW South of Path 26 After Baseline Procurement: (B) - (C)	7,119
(E)	Requirement North of Path 26	21,378
(F)	Available MW North of Path 26	22,706
(G)	Baseline MW Procured North of Path 26 by LSEs Serving Load North of Path 26	13,119
(H)	2019 S-N Path 26 Allocation	3,879
(I)	2019 N-S Path 26 Allocation	3,528

NP & SP 26 Average Import Scenario



NP 26 Max and SP 26 No Import Scenario



Scenarios that Exceed Path 26 Allocation

- It appears that the N-S Path 26 allocation will only be exceeded if:
  - Southern LSEs procure only the minimum amount of capacity South of Path 26
  - Southern LSEs procure average or less-than-average amount of import, and
  - Northern LSEs procuring a higher-than-average amount of imports
- These are extremely restrictive and worst case scenarios that are not likely to happen.