

**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation to Facilitate)	
Proactive Development of Transmission)	I.05-09-005
Infrastructure to Access Renewable Energy)	
Resources for California)	
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**OPENING BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON COST RECOVERY ISSUES**

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Pursuant the Assigned Commissioner’s Scoping Memo and Ruling, dated December 21, 2005 (“Scoping Memo”), in the above-referenced proceeding, the California Independent System Operator Corporation (“CAISO”) respectfully submits this opening brief on cost recovery issues related to the implementation of ratemaking mechanisms under Public Utilities Code § 399.25.¹

I. Introduction and Summary

This Commission properly recognizes that current rules governing the recovery of direct assignment transmission facilities necessary to interconnect a generating facility are “problematic for renewable generators for a number of reasons.” The CAISO commends the Commission for aggressively seeking solutions to any barriers that prevent the realization of the goals of the State’s renewable portfolio standards (“RPS”). The CAISO, while accepting its potential role in implementing such solutions, believes that the hierarchy of cost recovery solutions should look to available State mechanisms first, and only upon a determination that the State mechanism is infeasible, should an CAISO-based solution be pursued. In this regard, the CAISO agrees with the position advocated by Southern California Edison (“SCE”) that the

¹ All statutory references shall be to the Public Utilities Code unless otherwise stated.

Commission must confirm that its determination in Decision (D.) 03-07-033 that Section 399.25 only applies to “network” transmission facilities is erroneous.² Nothing in the statute prevents extension of Section 399.25’s rate recover mechanism to generation-tie lines and, in fact, the experience gained from SCE’s Antelope-Tehachapi 500 kV and 220 kV transmission project (“Segment 3”) demonstrates that the value of Section 399.25 lies precisely in its application to non-network facilities.

Section 399.25 SCE’s consent to the use of the Section 399.25 as the funding mechanism for Segment 3, provided the Commission grants certain rate recovery assurances, is important from a practical regulatory perspective. At the present time, it is unclear when, or if, another high voltage bulk transfer generation-tie line serving multiple generators will be necessary to achieve the goals of the RPS. Such uncertainty regarding future need militates in favor of utilizing existing regulatory authority to the maximum extent possible.

The CAISO further supports consideration of the general approach to rate recovery under Section 399.25 articulated by SCE in its Amended Antelope Application. In that application, SCE proposed to initially recover the Segment 3 annual revenue requirement from SCE’s retail customers. Subsequently, SCE would assess, through a Federal Energy Regulatory Commission (“FERC”) approved charge, each generator for its share of the capacity of the Segment 3 facilities.³ Indeed, the CAISO’s initial deliberations regarding its potential backstop contribution contemplates the concept of a similar charge assessed to generators for their pro rata share of the capacity of any high voltage bulk transfer facility. This proposal has the benefit of ultimately

² See, *Amended Application of Southern California Edison Company (U 338-E) for a Certificate of Public Convenience and Necessity to Construct the Antelope-Vincent and Antelope-Tehachapi Transmission Projects*, A.04-12-08 at p. 14 (Sept. 30, 2005) (“Amended Antelope Application”); see also *Order Instituting Investigation*, I.05-09-005 at p. 8, fn. 15 (Sept. 12, 2005) [recognizing that the distinction between generation-tie lines and network facilities for Section 399.25 purposes was “erroneous”].

³ *Id.* at 17-18.

passing the costs and risk of the generation-tie line to the renewable resource and those electricity providers that choose to contract for the renewable resource.

The CAISO strongly supports the State's RPS program and commits to cooperating with the Commission and market participants to achieve its salutary objectives. The CAISO's efforts, however, must compliment State policy. The Commission, through this investigation, should develop State policy with respect to implementing the Legislature's mandate expressed in existing Section 399.25. However, if this investigation reveals intractable barriers to renewable development under Section 399.25 or otherwise demonstrates a central role for the CAISO, the CAISO will proceed as appropriate.

II. Specific Cost Recovery Issues Raised by the Scoping Memo

The Scoping Memo requests that parties respond to the following questions:

- a. How should the Commission make findings of network benefits, pursuant to Section 399.25, and how should information or findings regarding network benefits affect the Commission's pursuit of cost recovery pursuant to Section 399.25 and through other means.

Under Section 399.25(b), the Commission is required to make findings, where appropriate, that transmission facilities needed to facilitate achievement of the State's renewable power goals "provide benefit to the transmission network." This requirement is imposed as part of the Commission's obligation to take all feasible action to ensure that the costs of such transmission facilities are included in rates established by the Federal Energy Regulatory Commission ("FERC"). However, the CAISO does not believe that a detailed, and perhaps protracted, assessment regarding how to define and measure potential network benefits constitutes a constructive use of the Commission's regulatory resources. This recommendation follows from the fact that FERC's test for rolled-in rate recovery does not rely on an evaluation of "network benefits." Rather, a transmission facility will be generally eligible for rolled-in

FERC rate recovery where the facility is not part of the “distribution” system⁴ and, if transmission, that the facility are “integrated” into the transmission system.⁵ FERC confirmed this application of its rules in rejecting rate recovery for the Antelope-Tehachapi 500 kV (Segment 3) project proposed by Southern California Edison.⁶ Consequently, any effort to define “network benefits” is unlikely to promote the objections underlying that provision of Section 399.25.

- b. What basis should the Commission use in determining whether transmission facilities are “necessary” to facilitate achievement of the RPS goals.

The CAISO believes this is a matter uniquely within the purview of the Commission. Nevertheless, the CAISO observes that establishing specific criteria during the RPS’s infancy may unduly restrict needed transmission infrastructure. The finding of “necessity” should present remain a flexible concept that accommodates potentially unforeseen circumstances.

- c. Should the cost of facilities that link a renewable generator to the first point of interconnection with the existing grid facilities be allocated solely to developers or should the costs be allocated on rolled-in basis.

As the Commission is well aware, under FERC precedent, the costs of direct assignment facilities that link a generator to the first point of interconnection with the existing grid are born by the generation developer. To the extent this question asks whether the State funding rules for direct assignment facilities under Section 399.25 should accommodate a single developer by deviating from FERC policy, the CAISO answers in the negative. On the other hand, it is reasonable for the Commission to find that high voltage transmission facilities planned and built to access remote areas with concentrated renewable resource potential and intended to serve

⁴ *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities, Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*, Order 888, FERC Stats & Regs ¶ 31,036 at 31,771 (1996).

⁵ See, e.g., *Mansfield Municipal Electric Department v. New England Power Co.*, 97 FERC ¶ 61,134 (2001).

⁶ *Southern California Edison Company*, 112 FERC ¶ 61,014 (2005).

multiple renewable generators may be deemed “necessary” to facilitate achievement of RPS goals and therefore subject to the rate recovery mechanism of Section 399.25. Further, the facilities necessary for generation developers to interconnect to the high voltage bulk transfer line should remain the responsibility of the generation developer.

- d. If costs should be allocated on a rolled-in basis, should they be recovered through FERC-approved transmission rates or Commission approved retail rates.

As the CAISO stated above, the CAISO believes it is appropriate to exhaust the possibilities under existing State authority prior to seeking to modify long-standing FERC policies with respect to funding generation-tie lines. If Section 399.25 cannot extend far enough, or is otherwise ineffective to fulfilling the objectives of the RPS program, then the CAISO believes it is appropriate to explore through its stakeholder process, the possibility of modifying its Tariff authority to permit rate recover through its Transmission Access Charge of certain generation-tie line facilities needed to promote renewable resources.

- e. What triggers should be developed for the staged permitting and construction of large-scale projects that might be necessary to ensure the success of the RPS program.

The CAISO does not believe it is possible or necessary to establish specific triggering criteria for future transmission projects needed to ensure the success of the RPS program. The Commission should, however, be vigilant in protecting the interests of ratepayers by ensuring that large, phased projects do not lead to stranded costs by the construction of unnecessary phases. As such, the Commission should develop, as a general matter, permitting and construction triggers on a case-by-case basis for those rare projects that require phasing. Those triggers should reflect, among other factors, the need for additional renewable power to meet RPS goals, the level of utilization and/or commitment for existing phases and proposed phases, and the potential market for additional renewable power.

- f. For transmission built in advance of energy projects coming on-line, how should the costs associated with under-utilized capacity be borne (i.e., should developers/IOU ratepayers/TAC fund carrying charges bear the cost of unutilized capacity; should cost recovery by IOUs be limited to carrying charges or should IOUs be limited to carrying charges or should IOUs be permitted to recover rate based on unutilized transmission capacity.

Under current rules and practice, a transmission owner is unlikely to submit an application to construct facilities needed to interconnect and integrate energy from independent energy producers until the generation developers have signed interconnection agreements. As noted above, the Commission must attempt to fashion rules or implement those rules in a manner that minimizes the potential for underutilized capacity. Further, it is clear that the greater the utilities risk exposure, the less likely Section 399.25 will be in fulfilling the objectives of the RPS program.

- g. For transmission facilities, permitted subject to cost recovery under Section 399.25, is it necessary or appropriate to ensure access on these facilities for renewable resources, or how do FERC's open access rules affect the ability of the state to ensure that facilities intended for renewable resources are available to those resources.

It is assumed for purposes of responding to this question that the transmission facility is not under CAISO operational control. The CAISO's FERC approved Tariff incorporates open access rules which provide grid access on a nondiscriminatory basis. If the high voltage bulk transfer generation-tie line remains under the operational control of the constructing utility, it is possible that the utility's FERC approved transmission tariff would establish the relevant rules.

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- h. How should cost allocation among IOU service territories be conducted for this backstop ratemaking authority?

The CAISO recognizes and defers to the Commission's expertise in the area of retail ratemaking.

January 27, 2006

Respectfully Submitted:

By: 

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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, an Opening Brief of The California Independent System Operator Corporation on Cost Recovery Issues to the parties on the service lists for Docket No. I.05-09-005.

Executed on January 27, 2006, at Folsom, California.



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