

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

Application of PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the Jefferson-Martin 230 kV Transmission Project	Application No. A-02-09-043
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**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
ON THE PRESIDING JUDGE'S PROPOSED DECISION AND THE
PROPOSED ALTERNATE DECISION OF PRESIDENT PEEVEY**

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Dated: June 28, 2004

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In accordance with Rules 77.2, 77.3, 77.4, and 77.6 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator (“CAISO”) respectfully submits its opening comments on the Presiding Judges Proposed Decision (“PD”) and the Proposed Alternate Decision of President Peevey (“PAD”) (collectively “Decisions”) in the above-captioned proceeding. Consistent with the CAISO’s participation in this proceeding, the CAISO’s comments focus solely on “project need,” as set forth in Section IV of the PD and PAD. The discussion of project need is materially identical in the PD and PAD. Accordingly, the CAISO’s comments apply equally to both Decisions.

I. The Decisions Properly Grant PG&E a Certificate of Public Convenience and Necessity, But Should Specify That The Jefferson-Martin 230 kV Project Is Needed By 2006

The CAISO strongly concurs with the conclusion reached in the Decisions that the Jefferson-Martin 230 kV project (“JM Project”) is needed to allow PG&E to reliably meet electric demand in the San Francisco Peninsula Area and that a certificate of public

convenience and necessity (“CPCN”) should therefore be granted pursuant to Public Utilities Code § 1001. The Decisions find that the JM Project is needed beginning in 2007.¹ While true, the record properly supports a finding that the JM Project is need by 2006. (Exhibit 38 at 3, 10; Exhibit 39 at 3, 5.)

The conclusion in the Decisions that the JM Project is needed by 2007 rests on a comparison of load forecast information for the San Francisco Peninsula Area (Table 1) and the results of the CAISO’s San Francisco Peninsula Load Serving Capability Study (“SF LSC Study” or “LSC” for load serving capability generally) scenarios 3 and 12 (Table 2). Although the results of the scenarios cited by the Decisions are accurate in and of themselves, the assumption that Hunters Point Units 1 and 4 remain online should be rejected. In the *Valley-Rainbow* decision, the Commission stated evidence must be “sufficiently convincing” to justify removal of existing capacity from the projection of generation supply.² The record compiled in this case satisfies the test and was fully detailed by CAISO in its Opening Brief at pages 22-24 and its Reply Brief at pages 12-13.

Specifically, without generation at Hunters Point, the JM Project is clearly needed by 2006. The CAISO determined that the load serving capability for the San Francisco Peninsula Area without the JM Project would be limited to 1862 MW. (Exhibit 38:3-20-

¹ As discussed herein, the CAISO argued that the JM Project was needed by 2006, in large part, based on the proper assumption regarding the retirement of Hunters Point Units 1 and 4. The Decisions and the CAISO, therefore, deviate by a year on when the project is needed. The Decisions largely mitigate against any potential system risk from in this distinction by finding that the diversification, economic and environmental benefits warrant the construction of the JM Project prior to 2007. The clear implication is that construction of the JM Project can proceed immediately. The CAISO supports this aspect of the Decisions and notes that energizing the JM Project prior to 2007 provides appropriate additional protection from uncertainty associated with load forecasting.

² *In the Matter of the Application of San Diego Gas & Electric Company (U 902-E) for a Certificate of Public Convenience and Necessity Valley-Rainbow 500 kV Interconnect Project*, D.02-12-066 (Dec. 24, 2002), mimeo at 24-25.

24 and 10:11-20.) Building the JM Project will increase the San Francisco load serving capability to 2092 MW. (Exhibit 38:3:23-24.) The need for the JM Project can be established in a straightforward manner by applying PG&E's March 2003 low load forecast for 2006 of 1,949 MW to the CAISO's load serving capability number. (Exhibit 4 at 65:11-13; Exhibit 163, Appendix 1.) This forecast exceeds the load serving capability of the San Francisco Peninsula Area without the JM Project. Moreover, as set forth in the record, other transmission reinforcements necessary for the JM Project to allow for closure of Hunters Point Units 1 and 4 have either been completed or are in progress. (Transcript at 511-512, 664, 679, 695-698; Exhibit 4 at 42-44.) Accordingly, the record fully supports determining project need based on analysis that assumes the absence of generation at Hunters Point and, in making such an assumption, irrefutably establish the need for the JM Project by 2006.

II. The Decisions Should Clarify that the Supplementary Guide Is Irrelevant to the Analysis Finding Need

The Decisions' discussion regarding the applicable reliability criteria warrants clarification. The Decisions refuse to "deviate from the ISO's conclusion that the Supplementary Guide [for Application of the Criteria for San Francisco] should be used in evaluating the Jefferson-Martin project." That statement is appropriate. Nevertheless, it also creates the false impression that the Supplementary Guide constitutes a material element of the particular CAISO's LSC analyses relied upon by the Decisions or the CAISO.

The CAISO's direct application of the Supplementary Guide in the SF LSC Study was limited to verifying an analysis presented to the CAISO by PG&E. (Exhibit 155 at

pp.52-53.) As explained by the CAISO in its briefs, the Supplementary Guide is immaterial to both the LSC analysis cited by the Decisions or by the CAISO in its testimony. In its Opening Brief, the CAISO stated:

As explained in the CAISO [Additional] Rebuttal Testimony in the context of evaluating the efficacy of rerating the 115 kV lines between Martin and San Mateo Substations, the ability to serve load within the San Francisco Peninsula Area without the JM Project remains limited by an outage of the Tesla-Ravenswood 230 kV line overloading the Newark-Ravenswood 230 kV line. (Exhibit 165 at 6:21-7:14.) This result is reported in Attachment 1 to Exhibit 165. Thus, the need for the JM Project is demonstrated without reference to the Supplementary Guide or particular contingencies on the transmission system between San Mateo and Martin Substations. (CAISO Opening Brief at 14.)

Similarly, LCS scenarios 3 and 12, cited by the Decisions, do not rely on the Supplementary Guide. The LSC number reported in SF LSC Study scenario three is based on an outage of the Newark-Ravenswood 230 kV line (Exhibit 155 at 63), while the LSC number reported in SF LSC Study scenario 12 is based on an outage of the Potrero-Larkin AY-1 115 kV line (Exhibit 155 at 79). Neither of these outage scenarios is derived from the Supplementary Guide. Accordingly, the Decisions should be modified to include a statement that the alleged dispute regarding application of the Supplementary Guide need not be addressed because project need is demonstrated without reference to the Supplementary Guide.

III. The CAISO Correctly Cited The Commission's *Valley-Rainbow* Decision

The CAISO cited the Commission's *Valley-Rainbow* decision for the proposition that the City and County of San Francisco's combustion turbines ("SFCTs") cannot be properly included in the resource supply mix because the project was neither under

construction nor had it received necessary regulatory permits. In particular, the CAISO noted that the *Valley-Rainbow* decision articulated a bright-line and prudent test:

Standard industry practice indicates that we should include proposed generating units that are under construction or have received regulatory permits in the resource mix for transmission planning purposes unless there is compelling evidence that the future of such plants is in question.³

The Decisions state that the cited language does not support the proposition for which it was cited by the CAISO. This is incorrect. The cited language is found in Section 6.2.1.5 of the decision entitled “Reasonable New Generation Assumptions.” That section addressed whether to include in the resource mix the Otay Mesa generating project, the Palomar generating project, and RAMCO units, among others. The *Valley Rainbow* Decision refused to assume that proposed generation projects that had not completed the regulatory approval process would "come on-line for purposes of our evaluation of reliability." Decision 02-12-006 at 34-35. The Commission refused to consider Palomar and the RAMCO units in the first instance because they did not satisfy the threshold test of being under construction or fully permitted. Thus, the passage was properly cited by the CAISO and the Commission should prevent future ambiguity by deleting footnote 19 or by simply citing the passage as support for excluding the SFCTs from the resource mix.

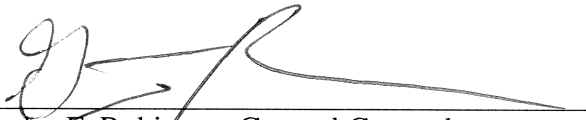
³ *Valley-Rainbow*, mimeo at 33.

IV. Conclusion

The CAISO supports the granting to PG&E of a CPCN to construct the JM Project. Consistent with this objective, the Decisions should be modified in the following three ways:

1. Finding of Fact #5 should be amended to find that the JM Project is needed to allow PG&E to continue to meet electric demand in the San Francisco Peninsula Area beginning in 2006, not 2007.
2. To the extent the Decisions rely on the CAISO's SF LSC Study scenarios, Section IV.C should be modified to clarify that the Supplementary Guide is immaterial to the Commission's decision and therefore any dispute regarding the appropriateness of its applicability need not be addressed in the Decisions.
3. Section IV.C should be modified by deleting footnote 19 or by simply citing the *Valley-Rainbow* decision as support for excluding the SFCTs from the resource mix.

Respectfully submitted,



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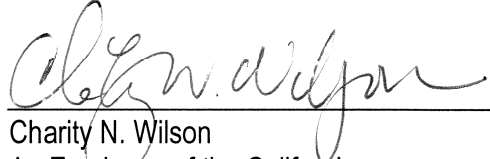
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Dated: June 28, 2004

PROOF OF SERVICE

I hereby certify that on June 28, 2004 I served, by electronic and U.S. mail, Opening Comments of The California Independent System Operator on The Presiding Judge's Proposed Decision and The Proposed Alternate Decision of President Peevey to the parties in Docket # A.02-09-043.

DATED at Folsom, California on June 28, 2004.

A handwritten signature in cursive script, appearing to read "Charity N. Wilson", written over a horizontal line.

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