

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

In the Matter of the Application of Southern
California Edison Company (U338E) for a
Certificate of Public Convenience and
Necessity for the RTRP Transmission
Project

A.15-04-013
(Filed April 15, 2015)

**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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February 6, 2020

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I. Introduction

Pursuant to Rule 14.6 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) hereby provides its opening comments supporting the Proposed *Decision Granting a Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project* (Proposed Decision), issued in this proceeding on January 17, 2020.

II. Discussion

The Proposed Decision grants Southern California Edison Company’s (SCE) application for a certificate of public convenience and necessity to construct the Riverside Transmission Reliability Project (RTRP). The Proposed Decision specifically finds that “[t]he RTRP would serve the public convenience and necessity by providing Riverside with a second source line that includes enough capacity to accommodate Riverside’s existing and projected load needs, by providing reliability in the event existing facilities serving Riverside are rendered inoperable, and by making the Riverside Energy Resource Center generation units available for CAISO market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside.”¹ Separately, the Proposed Decision notes that “[t]he RTRP would meet SCE’s obligations under its Wholesale Distribution Access Tariff to plan, construct, operate and maintain its distribution system to meet the projected load needs of

¹ Proposed Decision, p. 32.

its wholesale customers at a level of service comparable to that which SCE provides to meet its own customers' requirements and SCE's obligations under its Transmission Owner tariff, the Transmission Control Agreement between SCE and CAISO, and CAISO's Open Access Transmission Tariff to interconnect its system to the wholesale load of third parties in a non-discriminatory manner."² The Proposed Decision's bases its findings on a robust evidentiary record that accurately demonstrates the need for the RTRP. The CAISO fully agrees with the proposed findings of fact and conclusions of law and recommends that the Commission approve the Proposed Decision as soon as practicable.

III. Conclusion

The CAISO supports the Proposed Decision and recommends that the Commission grant SCE's application for a certificate of public convenience and necessity for the RTRP as soon as practicable.

Respectfully submitted

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² Proposed Decision, p. 31.