

**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 Riverside Transmission Reliability Project

Application 15-04-013
(Filed April 15, 2015)

**RESPONSE OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION TO MOTION TO DISMISS**

Pursuant to Commission Rules of Practice and Procedure 11.2, the California Independent System Operator Corporation (CAISO) hereby submits this response to the Motion to Dismiss Southern California Edison’s Application filed by the City of Jurupa Valley on June 28, 2016, as amended on June 29, 2016.

In this proceeding, Southern California Edison Company (SCE) has requested a certificate of public convenience and necessity (CPCN) to construct the Riverside Transmission Reliability Project (Riverside Transmission Project). SCE notes in its application that the purpose of the Riverside Project is to provide the City of Riverside and its customers with adequate transmission capacity to serve existing and projected load, to provide for long-term system capacity for load growth, and to provide needed system reliability. The City of Riverside is currently served by the Vista 230 kilovolt (kV) substation owned by SCE and under the CAISO’s operational control.

The City of Jurupa Valley moved to dismiss the CPCN application on the grounds that SCE has unreasonably delayed prosecution. The Commission should not dismiss SCE’s application because the CAISO Board of Governors approved the Riverside Transmission Project as a necessary addition to the CAISO Controlled Grid to meet the needs of the City of

Riverside and directed SCE to construct the project. Any alleged delay in prosecuting the present application has no bearing on the need for the Riverside Transmission Project. The Riverside Transmission Project is needed to reliably serve load in the City of Riverside going forward. The existing Vista substation is inadequate to serve the City of Riverside's increased load and expansion of the Vista substation is infeasible, as noted in the Final Environmental Impact Report. In addition, the Riverside Transmission Project will add a second point of interconnection for the City of Riverside to SCE's (and, thus, the CAISO) system, thus reducing the risk of service loss. Any alleged delay in review of the present application only serves to worsen the electric reliability issues identified by SCE and the CAISO. As a result, the CAISO requests that the Commission deny the City of Jurupa Valley's motion to dismiss.

Respectfully submitted,

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