

**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 Coolwater-Lugo Transmission Project.

Application 13-08-023  
(Filed August 28, 2013)

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

These comments supplement the California Independent System Operator Corporation's (CAISO) January 8, 2015 comments (Initial Comments) responding to the Commission's request for comments addressing the impact of the Coolwater Generating Station (Coolwater) retirement on the need for components identified as necessary to satisfy the terms of the large generator interconnection agreement (LGIA) between Southern California Edison Company (SCE), CAISO and Mojave Solar, LLC (Mojave Solar). The CAISO requests leave to supplement its Initial Comments due to subsequent material changes regarding the need for the Coolwater-Lugo Transmission Project.

The CAISO conducts an annual reassessment of Network Upgrades<sup>1</sup> identified in previous interconnection studies.<sup>2</sup> The CAISO's most recent reassessment indicates that sufficient capacity is available such that the Mojave Solar project may now achieve Full Capacity Deliverability Status, subject to review and approval by FERC. The change in deliverability status for the Mojave Solar project is primarily due to the election by several generating facilities in the area (other than Coolwater) to permanently retire and forego repowering. As a result of these elections, the retiring generating facilities have relinquished

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<sup>1</sup> All capitalized terms not defined herein have the meanings set forth in Appendix A of the CAISO tariff.

<sup>2</sup> See Appendix DD, Section 7.4 of the CAISO tariff; See also Appendix U, Section 8.5.

deliverability status and the capacity associated with those projects has been released to interconnection customers in the form of Full Capacity Deliverability Status. The reallocation of deliverability results in the Mojave Solar project achieving Full Capacity Deliverability Status.<sup>3</sup> As a result, the Coolwater-Lugo Transmission Project is no longer necessary in order for Mojave Solar to receive Full Capacity Deliverability, as was set forth in its LGIA.<sup>4</sup>

In addition, the CAISO will conduct additional Phase II Interconnection Studies to determine whether there is any residual need for any elements of the Coolwater-Lugo Transmission Project to interconnect other projects currently in the CAISO Queue. The CAISO will finalize these Phase II Interconnection Studies in November 2015. The CAISO recommends that the Commission suspend this proceeding and defer a decision on whether there is residual need for any elements of the Coolwater-Lugo Transmission Project until these studies have been completed and all necessary FERC approvals have been obtained.

Respectfully submitted,

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<sup>33</sup> See CAISO Business Practice Manual for Generator Interconnection and Deliverability Allocation Procedures (GIDAP), Section 6.2.9.2.

<sup>4</sup> Amended Application, p. 14; Amended LGIA, Appendix L to Amended Application.