

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

Conditional Application of SAN DIEGO GAS  
AND ELECTRIC COMPANY for a Certificate of  
Public Convenience and Necessity Authorizing the  
Construction of the Valley-Rainbow 500 kV  
Transmission Project

Application 01-03-036

**MOTION TO FILE LATE-FILED EXHIBIT 107 OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

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Dated: July 24, 2002

In accordance with California Public Utilities Code (CPUC) Rule 45, the California Independent System Operator (CA ISO) respectfully files this motion to submit late filed exhibit 107 (attached). The CA ISO considers that exhibit 107 contains information that is important for the CPUC to assess the availability of through-flow from Comisión Federal de Electricidad (CFE) during an outage of the Southwest Power Link (SWPL) in light of criticisms by Greenpeace in its opening brief of the CA ISO's analysis that is in the record.

In its opening brief, Greenpeace argues that the CA ISO's analysis of through-flow is flawed given that the hourly flows over La Rosita - Rumora used as the basis for the analysis included an eighteen month period before the addition of Presidente Juarez 8 & 9 in July 2001. Opening Brief for the Valley-Rainbow Interconnect Submitted by Greenpeace (Greenpeace Opening Brief) at 6-7. Although Greenpeace representative Mr. Ross was present during certain of the hearing days and at the Energy Division workshop, he did not, until the opening brief, raise this concerns through comments, presenting Greenpeace witnesses or cross-examination. Had Greenpeace raised the concern during the evidentiary hearings or the workshop, the CA ISO would have addressed the impact of this factor at that time. Greenpeace's concern is important and requires additional information to address.

Exhibit 107 sets forth the flows over La Rosita – Rumorosa without an outage of the SWPL, with an outage of SWPL but without La Rosita Power Plant, with an outage

of the SWPL and La Rosita Power Plant dispatched against Pittsburg generation, and with an outage of the SWPL and La Rosita Power Plant dispatched against Presidente Juarez generation, all using as a base flows over La Rosita – Rumorosa July 1, 2001 through July 1, 2002. The graph shows that although the factor cited by Greenpeace reduces the percentage of time in which flows exceed the rating of the La Rosita – Rumorosa line, it does not eliminate the CA ISO's concerns about through-flow, since with La Rosita Power Plant on line and an outage of the SWPL, flows over La Rosita – Rumorosa remain above the rating of the line a significant percentage of the time (32% if La Rosita Power Plant is dispatched against Pittsburg generation, and 59% if La Rosita Power Plant is dispatched against generation at Presidente Juarez).

Since Greenpeace did not raise its concern about the CA ISO analysis earlier, the CA ISO considers that it should be allowed to submit this late filed exhibit to illustrate the impact of the addition of Presidente Juarez 8 & 9. Without exhibit 107, the CPUC will have to surmise whether the concern raised by Greenpeace has an impact on through-flow or not, and the extent of the impact. It would be far better for the CPUC to have actual information on the matter instead. By submitting late filed exhibit 107, the CA ISO makes this information available to all parties to be used as appropriate in preparing their reply briefs.

The decision about whether or not a project such as Valley-Rainbow is needed is an important one that should be made based on factual information rather than suggestions or allegations that could have been dealt with factually during the hearings or the workshop but were not raised in these forums. Accordingly, the CA ISO respectfully requests that the CPUC accept late filed exhibit 107.

Respectfully submitted this 24th of July, 2002 by:

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