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Via Electronic Mail Only

California ISO
250 Outcropping Way
Folsom, California 95630
E-Mail: regionaltransmission@caiso.com

Re: Comments on Proposed Pardee-Moorpark No. 4 230 kV Transmission Circuit

Dear Sir/Madam:

On behalf of the City of Oxnard, we submit these comments regarding CAISO's consideration of Southern California Edison's proposal to construct a new Moorpark-Pardee transmission line. As CAISO is aware, the City has a significant interest in resource planning in the Moorpark subarea and is especially concerned about any proposal to add gas fired generation to the area. Oxnard has long shouldered a disproportionate share of the area's energy production requirements and is opposed to any new gas power plant located within Oxnard or the surrounding community. Given this history, the City appreciates CAISO's consideration of a transmission upgrade that would avoid constructing new fossil fuel plants the Moorpark subarea.

After considering the alternatives that CAISO presented to stakeholders on January 11, 2018, the City supports Edison's proposal to construct a new 230 kV transmission line between the Moorpark and Pardee substations to meet the Moorpark LCR need. The City is confident that alternatives that rely on procuring reactive support technology and/or greater renewable generation in lieu of a transmission line are also feasible options, but constructing a new transmission line strikes a prudent balance to addressing grid resiliency needs. The City therefore urges the CAISO Board to approve Edison's proposal to construct the new transmission line.

The City appreciates the opportunity to comment on this proposal and the important work of both CAISO's Staff and the Board on resource planning in the Moorpark subarea.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

A handwritten signature in blue ink, appearing to read "Ellison Folk", with a stylized flourish at the end.

Ellison Folk

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