

Stakeholder Comments Template
2017-2018 Transmission Planning Call 1/11/18,
Proposed Pardee-Moorpark No. 4 230 kV Transmission Circuit

Please submit comments (in MS Word) to regionaltransmission@caiso.com.

Submitted by	Company	Date Submitted
Jonathan Yuen	Southern California Edison	January 18, 2018

Southern California Edison (SCE) appreciates the opportunity to provide comments to the California Independent System Operator (CAISO). SCE reviewed CAISO's presentation on the Pardee-Moorpark No. 4 230 kV transmission circuit (the Project) and participated in the January 11, 2018 stakeholder meeting regarding the same. Below please find SCE's comments regarding specific sections of the presentation as well as general comments made during the stakeholder meeting.

“Goleta Resiliency” (slides 2, 5, & 6)

For consistency with the terminology used in SCE's Moorpark Sub-Area LCR Procurement Plan submitted to the California Public Utilities Commission (CPUC) for approval on December 21, 2017, please replace all instances of “Goleta resiliency *needs*” to “Goleta resiliency *objectives*” on slides 2, 5 and 6 of the CAISO's presentation.

“Comparison of alternatives” (slide 8)

CAISO's Alternative 1 is categorized as “Achievable” in terms of meeting the required 12/31/2020 in-service date. While SCE cannot guarantee at this point that full procurement is 100% “achievable” by the 12/31/2020 date, SCE is taking the necessary steps towards procuring and interconnecting resources to meet the LCR need by the 12/31/2020 OTC retirement compliance deadline. SCE recommends that the CAISO change its presentation to represent Alternative 1 as “Tx: Achievable, 86MW by 12/31/2020: Aggressive” and Alternative 3 as “Achievable” to “More aggressive.”

Licensing requirements for the No. 4 circuit

SCE anticipates the Project will not be subject to the CPUC licensing requirements under General Order No. 131-D because SCE currently plans to install “new or additional conductors, insulators, or their accessories on (or replacement of) supporting structures already built” which would not be subject to a Certificate of Public Convenience and Necessity (CPCN). SCE will

work with the CPUC and other regulatory agencies as needed to meet the 12/31/2020 OTC compliance deadline.

Estimated cost range of Preferred Resources in lieu of the No. 4 circuit (slide 8)

Based on its procurement experience, SCE offers an estimated range of net costs for the additional Preferred Resources that would be needed to meet the Moorpark LCR need in lieu of the proposed Moorpark-Pardee No. 4 line. As indicated on slide 8 of the CAISO's presentation, with Alternative 2, 318 MW of Preferred Resources will be needed absent the Project, and with Alternative 1 only 86 MW of Preferred Resources will be needed if the Project is installed. The 232 MW difference (318 MW minus 86 MW) between Alternatives 1 and 2 has an estimated net cost range of \$850 million to \$1 billion. For clarity, this estimated net cost range is solely for 232 MW of Preferred Resources and does not include the remaining 86 MW of Preferred Resources required to completely fulfill the 318 MW requirement described in Alternative 2 (slide 8).

Further, it should be noted that SCE considered the benefits (in dollars) of the Preferred Resources (e.g., energy value, capacity value, etc.) in its calculation of the estimated cost range. As such, the \$850 million to \$1 billion represents the estimated net costs of the additional 232 MW of Preferred Resources.