

**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 RTRP Transmission
Project

A.15-04-013
(Filed April 15, 2015)

**OPENING BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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The California Independent System Operator Corporation (CAISO) submits its opening brief in this proceeding pursuant to Rule 13.11 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), and the *Assigned Commissioner's Scoping Memo and Ruling* issued in this proceeding on December 20, 2018 (Ruling).¹

I. INTRODUCTION

In 2015, Southern California Edison Company (SCE) filed the present application for a certificate of public convenience and necessity (CPCN Application) for the Riverside Transmission Reliability Project (RTRP). The RTRP includes components that would be owned and operated by City of Riverside's Municipal Utility Department, Riverside Public Utilities (Riverside) and SCE in their individual capacities. Specifically, Riverside intends to construct, own, operate, and maintain certain elements of the RTRP, including the new 230/69 kilovolt (kV) Wilderness Substation, 69 kV subtransmission lines, and interconnection and telecommunication facilities. In contrast, the CPCN Application supports SCE's construction, operation, and maintenance of other elements of the RTRP, including:

- approximately eight miles of new overhead 230 kV transmission line;
- approximately two miles of new underground 230 kV transmission line;
- the new 230 kV Wildlife Substation;
- modifications of existing overhead distribution lines;

¹ As modified by the Administrative Law Judge's April 11, 2019 email Ruling extending the procedural schedule.

- modifications at existing substations; and
- telecommunication facilities between the existing Mira Loma and Vista Substations, and the proposed Wildlife Substation.

The CAISO recommends that the Commission grant SCE's CPCN Application for the RTRP to serve public convenience and necessity consistent with Public Utilities Code Section 1001.

II. DISCUSSION

The CAISO fully supports the RTRP to serve public convenience and necessity consistent with Public Utilities Code Section 1001, and the Commission should grant SCE's CPCN Application. The evidentiary record clearly demonstrates that the RTRP serves the public convenience and necessity by (1) providing transmission capability to meet Riverside's existing and future load; (2) providing Riverside with a second point of interconnection to the bulk electric system; and (3) allowing the CAISO to more efficiently dispatch internal Riverside generation.

A. RTRP Serves the Public Convenience and Necessity.

SCE and Riverside presented clear and convincing evidence that the RTRP serves the public convenience by providing transmission capability to meet Riverside's existing and future load. Riverside's actual gross system peak demand has consistently exceeded the 560 MW transfer capacity of the existing Vista Substation in the past 13 years.² As explained in its direct testimony, Riverside uses internal generation to mitigate thermal overloads on the Vista Substation when its loads exceed transmission capabilities. However, there are multiple challenges that will make it exceedingly difficult for Riverside's internal generation to deliver relief to the loading problem at the Vista Substation in the future.³

As highlighted in the CAISO's prepared direct testimony of John Phipps, the CAISO and Riverside are subject to an agreement, which was approved by the Federal Energy Regulatory Commission (FERC), to manage use of the Riverside Energy Resource Center (RERC)

² Exhibit RIV-01 (Lafond), p. 12:9-11.

³ Exhibit RIV-01 (Garcia), pp. 53:6-61:5.

generation assets to meet the dual system and local area needs.⁴ Under this agreement, the RERC units are subject to a variance that provides Riverside with dispatch control over the RERC's generation during high load conditions in its local area (*i.e.*, when Riverside area loads exceed 400 MW).⁵ This means that dispatch of the RERC units dispatch is controlled by Riverside to alleviate local issues rather than the being optimized to meet needs of the CAISO controlled grid. Thus, the RERC units are not available to economically meet CAISO system and flexibility needs during Riverside's high load periods. Once the RTRP is in place, the agreement to limit operation of the RERC will be rescinded and these resources will be fully available for CAISO market dispatch to support system reliability, flexibility, and efficiency.

In addition to the benefits described above, the RTRP will also provide a second point of interconnection to reliability serve Riverside's load. This is important because Riverside has experienced significant load shedding due to outages at the Vista Substation. By providing a second point of interconnection to the bulk electric system, the RTRP will effectively mitigate the risk of load shedding or blackouts due to the loss of a single transmission element or substation.

B. The Commission Should Limit Non-Consequential Load Shedding in the Riverside Area.

The main driver for the RTRP is to supplement the transmission capability to Riverside, which is currently supplied through the 220/66 kV transformers at the Vista Substation. The transformers and related low voltage busses at the Vista Substation are not a part of the bulk electric system, nor are these facilities under the CAISO's operational control, and are not subject to the CAISO's transmission planning standards.

Nonetheless, the CAISO transmission planning standards are designed to ensure secure and reliable operation of the CAISO controlled grid based on the specific circumstances and conditions applicable to the CAISO system. Although the facilities at issue in this proceeding are not part of the CAISO controlled grid, the CAISO transmission planning standards provide relevant principles that should inform the Commission's determination regarding the extent to which load shedding should be allowed in the Riverside area.

⁴ Exhibit ISO-01 (Phipps), p. 2:4-17.

⁵ *Id.*

As explained in Riverside’s direct testimony, Riverside is part of a high density urban load area.⁶ For long-term planning purposes, the CAISO’s transmission planning standards do not allow non-consequential load shedding in a high density urban load area to mitigate for contingencies.⁷ The CAISO implemented this standard, in part, because load shedding in high density urban load areas can “have significant adverse impacts on the community from hospitals and elevators to traffic lights and potential crime.”⁸ Although the RTRP is not subject to CAISO transmission planning standards, it is reasonable for the Commission to approve the RTRP to reduce load shedding in a high density urban load area, for the same reasons cited in the CAISO’s transmission planning standards.

Riverside provided evidence demonstrating that load shedding could cause significant impacts to the community, including loss of service to critical facilities such as hospitals, fire stations, and emergency operations centers.⁹ Based on the significant critical infrastructure facilities located within Riverside, and with Riverside being a high density urban load area, the Commission can and should plan to limit non-consequential load shedding consistent with CAISO’s transmission planning standards.

III. CONCLUSION

The CAISO reiterates its support for the RTRP and recommends that the Commission approve SCE’s CPCN Application to build the project.

Respectfully submitted

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⁶ Exhibit RIV-02 (Lafond), p. 4:10-19.

⁷ Exhibit RIV-02 (Lafond), p. 33:11-14 (citing the CAISO transmission planning standards).

⁸ *Id.*, p. A-126.

⁹ Exhibit RIV-01 (Hearn/Annas), p. 41:28-44:2.