

**CALIFORNIA ISO  
APPROVAL OF TRANSMISSION ELEMENTS UNDER \$50 MILLION**

---

**COMMENTS OF THE STAFF OF THE  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
ON THE MAY 31, 2012 STRAW PROPOSAL**

\* \* \* \* \*

**June 13, 2012**

The Staff of the California Public Utilities Commission (CPUC Staff) appreciates this opportunity to comment on the California Independent System Operator's (CAISO) Straw Proposal for providing expedited management approval and competitive solicitation for those transmission "elements" (eligible for competitive solicitation) having estimated costs below \$50 million. We understand that the essence of the proposal is that the CAISO would amend its tariff to:

1. Enable CAISO management approval of transmission elements that are estimated to cost less than \$50 million.
2. Enable a separate competitive solicitation process for eligible elements less than \$50 million to proceed ahead of the timelines set out in the tariff for the annual competitive solicitation process, which would generally follow Board approval of a comprehensive transmission plan.

We understand that "element" refers to a transmission facility or possible grouped facilities that are included in the CAISO's transmission plan but which are not yet assigned to a particular developer, because they qualify for competitive solicitation.

CPUC Staff support this proposal, provided that

1. transmission elements in question are subjected to the levels of transparency and comprehensiveness of analysis required for inclusion of any transmission additions in the CAISO's annual transmission plan, including consideration of alternatives and economic efficiency, as well as consistency with resource planning and with state energy policy; and

2. acceleration of processes for approval and competitive solicitation for such elements should be accomplished in a manner that does not significantly inhibit ability of independent developers to qualify and compete to build the elements.

**Contacts:**

Keith White, [kwh@cpuc.ca.gov](mailto:kwh@cpuc.ca.gov)  
Mihai Cosman, [mr2@cpuc.ca.gov](mailto:mr2@cpuc.ca.gov)  
Noel Obiora, [nao@cpuc.ca.gov](mailto:nao@cpuc.ca.gov)