# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project

Application 06-08-010 (Filed August 4, 2006)

### MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION FOR EXTENSION OF TIME TO FILE ADDITIONAL TESTIMONY

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February 16, 2007

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#### I. Introduction and Background

On January 22, 2007 the California Independent System Operator (CAISO) filed a Motion for Leave to File Additional Testimony on February 16, 2007. In that Motion, the CAISO requested leave to file its initial testimony in two stages: on January 26, 2007 and on February 16, 2007. The CAISO suggested that the January 26, 2007 testimony include information describing the CAISO's original analysis, as well as any updates and revisions. The January 26, 2007 testimony would also include an evaluation of the revised CAISO base case and the alternative scenarios described in the CAISO's January 8, 2007 Motion for Extension.

With respect to the additional testimony, the CAISO explained that as part of its work plan, the decision was made to bring in an outside consultant not only to assist with the preparation of the studies (particularly the economic analyses), but to conduct an overall evaluation of the original Sunrise Powerlink study and the updates being made to the base case to reflect changes in circumstances and other assumptions. This overall evaluation and verification by the outside consultant would be included in the second phase of testimony to be filed on February 16, 2007. This proposal essentially would

have the CAISO file its initial round of testimony in two stages, on January 26, 2007 and on February 16, 2007.

The CAISO filed Part I of its Initial Testimony, and San Diego Gas & Electric Company (SDG&E) filed Supplemental Testimony, on January 26, 2007. Also on that date, an ACR/ALJ Ruling was issued on both the CAISO Motion for Extension and Motion to File Additional Testimony. With respect to the February 16, 2007 proposed date for the filing of additional testimony, the ruling withheld a decision on the CAISO request pending the filing of the testimony and an opportunity for parties to respond within 7 days after the testimony was filed (Ruling, 5). The CAISO was asked to provide weekly status updates as to the progress being made on its analyses.

II. The Assumption Changes Described In SDG&E's Supplemental Testimony And At The February 2, 2007 Testimony Workshop Have Necessitated A Brief Extension For Filing The Additional Testimony.

When the CAISO filed its Motion regarding the additional testimony, it was not anticipated that SDG&E would make substantial changes to its studies between the January 19, 2007 Errata filing and the January 26, 2007 Supplemental Testimony filing. Indeed, these changes were not readily apparent until the February 2, 2007 Testimony workshop in San Diego. At that time, the CAISO benefited both from the explanation provided by SDG&E (specifically with regard to Supplemental Testimony Appendix J) and the questions posed by the active parties to the case. In light of this additional information, the CAISO intends to make certain modifications to its base case, rerun the scenarios contained in the January 26, 2007 testimony, and prepare an errata highlighting the changes in the results of the prior studies.

The additional testimony will contain the errata and a detailed description of the assumptions and changes made to the WECC database. For validation purposes, the CAISO is also in the process of creating an economic base case for 2020 that is RPS-compliant that will then be run with Sunrise. This 2020 data point will also be described in detail in the additional testimony.

The significant modifications to the base case assumptions that became necessary following the testimony workshop have caused the CAISO to re-evaluate the very nature of its study processes and to greatly expand the scope of the additional testimony. Specifically, Sunrise presents very complex integrated resource issues with many uncertainties that vary by benefit type. In light of the complicated nature of the Sunrise project evaluation, the CAISO believes that its most constructive role in this proceeding is to provide its own independent analysis of Sunrise; offer an independent review of evaluations by SDG&E and other parties in this proceeding and facilitate third-party review of its own filing and other filings by attempting to provide as much transparency as possible in all of its own work. This expanded scope of the additional testimony will add value and completeness to the record of this case, but it cannot be accomplished by February 16, 2007. Thus, the CAISO seeks a brief extension to file Part II of its Initial Testimony on March 1, 2007.

The parties and the ALJ were advised of this request on February 13, 2007 in the CAISO's 1<sup>st</sup> Weekly Status Report. Once again, this request for a March 1, 2007 date for filing the additional testimony will not impact the Interveners' alternative scenario study process time schedule, which is going forward on a separate and parallel track with the development of the economic reference and Sunrise cases and the testimony. The

schedule for periodically releasing the study results is under consideration and the parties will be updated via the weekly status reports.

#### II. Conclusion

The CAISO has complied with prior rulings by filing Initial Testimony (Part I) on January 26, 2007 describing the CSRTP Report and evaluating certain alternative scenarios. Since that filing, the CAISO has hired other consultants to assist with the ongoing Interveners' alternatives study process, and the Energy and Environmental Economics, Inc. ("E3") consultants have also been working on the economic reference and Sunrise case adjustments described above. A brief extension of time, until March 1, 2007, to file Part 2 of the Initial Testimony has no downside implications but will provide substantial benefits in terms of the CAISO's independent evaluation of Sunrise. For all of these reasons, leave should be granted to the CAISO to file the additional testimony on that date.

Respectfully submitted,

/s/Judith B. Sanders

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served, by electronic and United States mail, a Motion Of The California Independent System Operator Corporation For Extension Of Time To File Additional Testimony in Docket No. A.06-08-010.

Executed on February 16, 2007, at Folsom, California.

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