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Submitted to: [regionaltransmission@caiso.com](mailto:regionaltransmission@caiso.com)

**COMMENTS OF THE SIERRA CLUB AND  
THE CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE  
REGARDING THE MOORPARK-PARDEE CIRCUIT PROJECT AND S-LINE UPGRADE,  
AS PART OF THE 2017-2018 TRANSMISSION PLANNING PROCESS**

Sierra Club and the California Environmental Justice Alliance (“CEJA”) submit the following comments to express strong support for both the California Independent System Operator’s (“CAISO”) proposed Moorpark-Pardee 230 kV No. 4 Circuit Project and its participation with the Imperial Irrigation District (“IID”) to upgrade IID’s existing S-line. Sierra Club and CEJA appreciate CAISO’s effort to move these cost-effective projects forward. Both will provide significant environmental benefits and we urge their approval by the CAISO Board.

**1. The Moorpark-Pardee Circuit Project Avoids the Need for New Gas-Fired Generation to Meet Local Area Need in the Moorpark Subarea and Will Facilitate Achievement of California’s Environmental Justice, Climate Adaptation and Clean Energy Objectives.**

Sierra Club and CEJA strongly support the proposal to string a fourth 230 kV circuit between the Moorpark and Pardee substations. As CAISO is well aware, the Puente project, which had originally been contracted to meet local area need, posed significant environmental justice, sea level rise, and biological resource concerns and was strongly opposed by the City of Oxnard, numerous state legislators, and environmental justice and environmental organizations. In contrast, extending a new transmission line on existing transmission towers is an efficient use of the built environment with minimal environmental impact. The Moorpark-Pardee Project is a significant component of Southern California Edison’s recently issued procurement plan to meet local area need in the wake of Puente’s pending rejection by the California Energy Commission. By substantially reducing the local capacity deficiency in the Moorpark Local Capacity Resource (LCR) area, the transmission upgrade obviates the need for new gas-fired generation to meet local area need and avoids the many impacts posed by the Puente project. We applaud CAISO’s efforts to identify environmentally preferable alternatives to Puente and urge the CAISO Board to approve this important project.

**2. Upgrades to the S Line Upgrade Will Provide Significant Environmental Benefits and Improve Resilience in the San Diego Area in the Event of Limits on Gas Imports.**

Sierra Club and CEJA also strongly support the CAISO's efforts to upgrade and reconductor the S Line connecting San Diego to the Imperial Valley sub-area. Import capability into San Diego is currently constrained by thermal limits on the S Line. Adding a second circuit to the S Line would increase the amount of energy that could be imported to San Diego, improving electric reliability and resiliency in the region. Additionally, greater access to energy imports from the Imperial Valley will increase San Diego's access to renewable resources: the Imperial Valley is recognized as one of the highest potential sources of geothermal generation, and is designated as a Competitive Renewable Energy Zone and included in the Renewable Energy Transmission Initiative.

An upgrade to the S Line has the added benefit of increasing grid reliance in the event gas supplies cannot be delivered to the San Diego to power in-basin gas generation. Notably, San Diego Gas and Electric and Southern California Gas Company are currently requesting authorization at the Public Utilities Commission to construct a redundant gas pipeline into San Diego, justified in the name of system resiliency. The utilities claim one reason the new pipeline is needed is to ensure electric reliability in San Diego in the event an unexpected, extended pipeline outage of existing Line 3010 curtails gas deliveries to in-basin generators. (An unplanned outage of Line 3010 has only occurred once, for a day, in 1985 and did not result in a loss of customer service.) The utilities estimate the project will cost ratepayers \$2 billion and be ratebased through at least 2063.<sup>1</sup> Upgrading the S Line, by contrast, would reduce reliance on in-basin gas generation in the event such an outage occurred and, at the CAISO's estimated cost of under \$50 million, would represent significant cost savings. At a time of rapid decarbonization of the energy sector, the proposed S Line upgrade represents a much more forward-thinking investment than a costly expansion of fossil fuel infrastructure.

Accordingly, Sierra Club and CEJA urge CAISO to approve both the Pardee-Moorpark and S Line transmission upgrades.

Respectfully,

*/s/ Alison Seel* \_\_\_\_\_

Alison Seel  
Sierra Club  
2101 Webster St., 13<sup>th</sup> Floor  
Oakland, CA 94612  
Telephone: (415) 977-5737  
Email: [alison.seel@sierraclub.org](mailto:alison.seel@sierraclub.org)

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<sup>1</sup> A.15-09-013, Application of SDG&E and SoCalGas for a Certificate of Public Convenience and Necessity for the Pipeline Safety and Reliability Project (Filed Sept. 30, 2015).

Matt Vespa  
Earthjustice  
50 California St., Suite 500  
San Francisco, CA 94111  
Telephone: (415) 217-2123  
Email: [mvespa@earthjustice.org](mailto:mvespa@earthjustice.org)

Shana Lazerow  
On behalf of the California Environmental  
Justice Alliance  
6325 Pacific Boulevard, Suite 300  
Huntington Park, CA 90255  
Telephone: (510) 302-0430 X 18  
Email: [slazerow@cbeal.org](mailto:slazerow@cbeal.org)