

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine  
Electric Utility De-Energization of Power  
Lines in Dangerous Conditions.

Rulemaking 18-12-005  
(Filed December 13, 2018)

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
REPLY COMMENTS ON PHASE 1 ISSUES**

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Dated: April 2, 2019

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine  
Electric Utility De-Energization of Power  
Lines in Dangerous Conditions.

Rulemaking 18-02-005  
(Filed December 13, 2018)

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
REPLY COMMENTS ON PHASE 1 ISSUES**

The California Independent System Operator Corporation (CAISO) hereby provides reply comments pursuant to the procedural schedule set forth in the *Assigned Commissioner’s Scoping Memo and Ruling (Phase 1)*, issued March 8, 2019, in this proceeding. The primary purpose of these reply comments is to clarify that the CAISO’s role during electric transmission system de-energization events. Specifically, the CAISO clarifies that safety-related transmission system de-energization events are initiated and controlled by transmission owners, consistent with state and federal laws and regulations. The CAISO does not direct or approve any safety-related de-energization, but seeks to coordinate with transmission owners to provide reliable electric transmission service.

**I. Introduction**

The CAISO is a non-profit, public benefit corporation that manages the flow of power over the high-voltage electric grid and administers fair and efficient wholesale power markets. The CAISO’s primary focus is maintaining grid stability, and in that capacity, it works with transmission owners to maintain assets to accommodate power flowing through transmission lines. Although the CAISO manages the reliability of the majority of the California transmission system, transmission owners have the exclusive right to operate and maintain their respective transmission facilities.<sup>1</sup> Transmission owners have a duty to operate and maintain their respective transmission facilities to ensure the safety of personnel and the general public. Consistent with that duty, the CAISO Transmission Control Agreement specifies that transmission owners may take facilities out of service without CAISO approval “in cases

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<sup>1</sup> See generally, CAISO Transmission Control Agreement (TCA), Section 6.1, Physical Operation of Facilities. <http://www.caiso.com/Documents/TransmissionControlAgreement.pdf>.

involving immediate hazard to the safety of personnel or the general public or imminent damage to facilities.”<sup>2</sup>

## **II. Discussion**

In opening its comments in this proceeding, the Commission’s Office of Safety Advocate (OSA) noted that transmission lines “have an additional set of stakeholders and decision-makers in comparison to distribution facilities” and that the CAISO should participate in this proceeding to provide guidance.<sup>3</sup> The CAISO agrees that its participation can be informative and looks forward to working with the Commission in this and other forums as necessary to provide the Commission the information it needs to make an informed decision regarding transmission line de-energization policies.

The OSA also states that “[n]umerous generators and load serving entities would be affected physically and economically by de-energization events undertaken by the CAISO.”<sup>4</sup> Contrary to the implication in OSA’s comments, the CAISO does not direct transmission line de-energization events. Transmission owners—not the CAISO—operate their respective transmission lines consistent with applicable state and federal laws and regulations. In addition, transmission owners may take facilities out of service without CAISO approval in cases involving hazards to public safety or imminent damage to facilities.<sup>5</sup> As a result, although the CAISO does coordinate outages in its normal course of business,<sup>6</sup> it does not direct or approve transmission line de-energization to mitigate wildfire safety risk. Transmission owners must notify the CAISO regarding any transmission line de-energization, then the CAISO works with transmission owners to maintain the reliability of the electric transmission system.

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<sup>2</sup> *Id.*, Section 6.1.4, Outages.

<sup>3</sup> Opening Comments of the OSA, p. 11.

<sup>4</sup> *Id.*

<sup>5</sup> CAISO TCA, Section 6.1.4, Outages.

<sup>6</sup> CAISO Tariff Section 9.1 requires the CAISO to coordinate and approve Maintenance Outages and coordinate responses to Forced Outages. Maintenance Outages and Forced Outages are defined in Appendix A to the CAISO Tariff.

### III. Conclusion

The CAISO appreciates this opportunity to provide reply comments and clarify the record in this proceeding.

Respectfully submitted,

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