

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

In the Matter of the Application Of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for a Certificate of Public Convenience and Necessity: Eldorado-Lugo-Mohave Series Capacitor Project.

A.18-05-007
(Filed May 2, 2018)

**OPENING COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON
THE PROPOSED DECISION**

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits these comments on the Proposed *Decision Granting Certificate of Public Convenience and Necessity for the Eldorado-Lugo-Mohave Series Capacitor Project* (Proposed Decision). The CAISO supports the Proposed Decision and recommends that the Commission vote to approve it as soon as possible.

The Proposed Decision grants Southern California Edison Company (SCE) a certificate of public convenience and necessity for the proposed Eldorado-Lugo-Mohave Series Capacitor Project (ELM Project). The Proposed Decision also finds that the Mitigated Negative Declaration prepared for the ELM Project meets the California Environmental Quality Act requirements and adopts the mitigation measures identified therein. The Proposed Decision finds as follows:

The ELM Project is needed to meet various electric providers’ and the State’s [renewable portfolio standard] requirements, as determined by the Commission and the State’s clean energy goals. It is prudent to plan for long lead times both in the development of new renewable energy resources and in the development of new transmission projects. As the state marches toward 60 percent zero-carbon energy resources by 2030 and toward 100 percent zero-carbon energy resources by 2045, it is appropriate to take action to alleviate the Desert Area deliverability constraint upon renewable energy development.

The CAISO agrees with these findings and recommends the Commission adopt the Proposed Decision and grant SCE's request for certificate of public convenience and necessity for the ELM Project.

Respectfully submitted,

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Dated: August 11, 2020