

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

In the Matter of the Application of San Diego  
Gas & Electric Company (U902E) for a  
Certificate of Public Convenience and  
Necessity for the South Orange County  
Reliability Enhancement Project.

Application 12-05-020

**RESPONSE TO APPLICATIONS FOR REHEARING OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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**I. Introduction**

Pursuant to Rule 16.1 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) files this response to the applications for rehearing of Decision (D.) 16-12-064 filed by the City of San Juan Capistrano (SJC) and Forest Residents Opposing New Transmission Lines (Frontlines). D.16-12-064 granted San Diego Gas & Electric Company’s (SDG&E) application for a certificate of public convenience and necessity (CPCN) to build the South Orange County Reliability Enhancement (SOCRE) Project. Rule 16.1(b) requires that applications for rehearing “set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous, and must make specific references to the record or law.” The applications filed in this proceeding fail to identify unlawful or erroneous portions of D.16-12-064; rather, they make unsupported assertions that run contrary to the technical analysis conducted during the course of this proceeding. This response addresses arguments regarding (1) the public necessity and convenience for the SOCRE Project, (2) the feasibility of the No Project Alternative, (3) the feasibility of Alternative J, (4) the feasibility of Alternative F, and (5) D.16-12-064’s treatment of project objectives. The Commission should reject the applications for rehearing and affirm D.16-12-064 in full.

**II. Background**

D.16-12-064 grants SDG&E’s request for a CPCN for the SOCRE Project based on uncontroverted technical analysis presented during course of this proceeding. SDG&E and the CAISO presented detailed power flow analysis studying the SOCRE Project and all of the

project alternatives identified in the Final Environmental Impact Report (FEIR). The CAISO also studied all of the different variations on the FEIR project alternatives that Frontlines and SJC presented in testimony. In each case, the project alternatives either failed to resolve all reliability concerns or created new reliability concerns. As a result, the alternatives failed to meet the fundamental project objective to “reduce the risk of instances that could result in the loss of power to customers served by the South Orange County 138 kV System.”<sup>1</sup> In contrast, the SDG&E and CAISO analyses show that the SOCRE Project cost-effectively mitigates all identified reliability concerns while providing the South Orange County 138 kV with a second independent source of power from the 230 kV transmission grid. Neither SJC nor Frontlines conducted any technical analyses to support the feasibility of their preferred alternatives.

### **III. Discussion**

#### **A. The Commission’s Finding that the SOCRE Project Serves a Public Convenience and Necessity is Supported by Substantial Evidence.**

Both Frontlines and SJC argue that D.16-12-064 lacks substantial evidence to support Commission’s finding of public convenience and necessity for the SOCRE Project.<sup>2</sup> To the contrary, there is ample, uncontroverted evidence in the record supporting the need for the SOCRE Project. As the CAISO outlined in testimony, the SOCRE Project is primarily driven by the need to bring the South Orange County system into compliance with mandatory North American Electric Reliability Corporation (NERC) reliability requirements.<sup>3</sup> In its 2010-2011 transmission plan, the CAISO identified numerous Category C contingencies that resulted in exceedance of applicable ratings in the South Orange County area within the ten-year planning horizon.<sup>4</sup> In the NERC reliability standards, a Category C contingency is generally defined as the loss of one system element followed by the loss of a second element.<sup>5</sup> A Category C

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<sup>1</sup> FEIR, p. ES-2.

<sup>2</sup> Application for Rehearing of D.16-12-064 Filed by Forest Residents Opposing New Transmission Lines (Frontlines Application), p. 24; City of San Juan Capistrano’s Application for Rehearing of Decision 16-12-064 Granting Certificate of Public Convenience and Necessity to San Diego Gas & Electric Company To Improve Reliability in its South Orange County Territory (SJC Application), p. 7.

<sup>3</sup> Exhibit CAISO-500, p. 9.

<sup>4</sup> Id.

<sup>5</sup> NERC Standards were revised as of January 1, 2016 to delete references to Category A, B, C and D contingencies. Instead, the NERC Standards now refer to contingencies P0 through P7. The contingency events and the required corrective action remain similar. For the purposes of this brief, the CAISO continues to refer to Category C contingencies consistent with the testimony produced in this proceeding. See also Exhibit SDGE-3.2R, p. 13 for a table presenting contingencies under both prior and current NERC standards.

contingency is also commonly referred to as an “N-1-1” contingency event. NERC standards require corrective action to meet Category C contingency overloads.<sup>6</sup>

The CAISO updated its analysis during the course of this proceeding to determine whether the originally identified reliability concerns continue to exist.<sup>7</sup> The CAISO’s analysis shows that significant reliability concerns continue to exist, despite reduction in projected load growth over the 10-year planning horizon.<sup>8</sup> Specifically, the CAISO’s updated analysis found 26 thermal overloads on eight distinct facilities that develop over the ten-year planning horizon without the SOCRE Project.<sup>9</sup> The CAISO identified 13 unique contingencies that cause these overloads.<sup>10</sup> The eight distinct facilities and the 13 unique contingencies cannot be addressed through a Special Protection System (SPS) without violating the CAISO Planning Standards.<sup>11</sup>

The CAISO also identified numerous reliability concerns that arise during maintenance outages at the Talega Substation.<sup>12</sup> The CAISO, as a NERC-designated Planning Authority, assessed the system reliability performance by including the planned (including maintenance and construction) outage of any bulk electric system element at demand levels for which planned outages are performed.<sup>13</sup> The CAISO identified a total of 57 reliability events that would result in an uncontrolled interruption of service when a maintenance outage at the Talega Substation is followed by a contingency event.<sup>14</sup> Four of these events were the result of Category B contingencies, which are defined as the loss of a single system element.<sup>15</sup> This means that the failure of just a single transformer element could potentially disrupt service to South Orange County customers during a planned maintenance at the Talega Substation.<sup>16</sup> 27 events could disrupt service to all South Orange County customers as a result of identified Category C contingencies.<sup>17</sup> The CAISO also identified 26 events under which planned maintenance

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<sup>6</sup> Exhibit ORA-211, p. 4, Section B, R2.7;

<sup>7</sup> Exhibit CAISO-500, p. 10.

<sup>8</sup> Id.

<sup>9</sup> Id.

<sup>10</sup> Id.

<sup>11</sup> Id.

<sup>12</sup> Id.

<sup>13</sup> Exhibit CAISO-500, p. 10; Exhibit ORA-211, p. 2, Section B(R1).

<sup>14</sup> Exhibit CAISO-502, p. 7.

<sup>15</sup> Exhibit ORA-211, p. 8.

<sup>16</sup> Exhibit CAISO-502, p. 8.

<sup>17</sup> Id.

followed by a Category C contingency would result in an uncontrolled interruption of service to a significant number of customers.<sup>18</sup>

These circumstances present a clear and critical operational concern because there are no windows for performing necessary maintenance or construction activities without facing unacceptable risk of the loss of *all* load in South Orange County.<sup>19</sup> This would occur because the South Orange County system currently relies primarily on a single power source from the Talega Substation to serve load.<sup>20</sup> Loss of that power source would result in a loss of all load in South Orange County.

This uncontradicted evidence, in addition to similar technical analysis from SDG&E, provides the basis for Finding of Fact No. 12 in D.16-12-064, which states:

The proposed project will reduce the risk of instances that could result in the loss of power to customers served by the South Orange County 138-kV System through the 10-year planning horizon, replace inadequate equipment at Capistrano Substation, and redistribute power flow of the applicant's South Orange County 138-kV System such that operational flexibility is increased.<sup>21</sup>

There is a clear need for the SOCRE Project to address the numerous reliability concerns identified in South Orange County over the transmission planning horizon and the record evidence shows that only the SOCRE Project meets all of these concerns.

## **B. The No Project Alternative**

### *i. Substantial Evidence Shows that the No Project Alternative Does Not Meet NERC and CAISO Planning Standards.*

D.16-12-064 correctly notes that the No Project Alternative carries the risk of significant loss of non-consequential load under a single contingency event which is a violation of NERC planning standard TPL-001-4.<sup>22</sup> This conclusion is supported by the CAISO's technical analysis, which shows four Category B single contingency events under maintenance outages that would result in non-consequential load loss and violations of the NERC standards.<sup>23</sup> In two scenarios, the Category B contingencies cause excessive overloads on the 69/138 kV equipment that

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<sup>18</sup> Id.

<sup>19</sup> Id.

<sup>20</sup> Id.

<sup>21</sup> D.16-12-064, p. 35.

<sup>22</sup> D.16-12-064, p. 22. Non-consequential load loss is defined as disconnecting customers who are not directly connected to the faulted device in order to protect the transmission system.

<sup>23</sup> Exhibit CAISO-502, p. 9.

connects San Luis Rey and Talega Substations that must be mitigated by an SPS which results in the non-consequential load loss of all load in South Orange County.<sup>24</sup> In the remaining two Category B contingency scenarios, the CAISO must drop non-consequential load to ensure that the loads remain within remaining load serving capability, which is reduced to 195 MW.<sup>25</sup> Dropping non-consequential load in these circumstances would violate NERC TPL-001-4, which does not allow dropping non-consequential load after a single contingency.

SJC contends that these Category B contingency events can be mitigated by performing maintenance only during low load periods.<sup>26</sup> However, SJC's assertion is based on the incorrect assumption that all load loss during maintenance events is consequential (and therefore allowable under NERC TPL-001-4). To the contrary, under the four Category B maintenance scenarios identified by the CAISO, all load loss is non-consequential and therefore not allowed under TPL-001-4. In two of the four events, there would be non-consequential loss of the entire South Orange County load. As a result, there are no hours in which SDG&E can safely conduct maintenance activities at the Talega Substation without the SOCRE Project. In addition to the four single contingency maintenance outage events discussed above, there are 53 Category C CAISO-identified reliability issues during maintenance events, 38 of which would result in non-consequential load loss.

Thus, a host of reliability issues, including non-consequential loss of load in violation of NERC planning standards, would persist if the Commission failed to approve the SOCRE Project. These reliability concerns include violations of the NERC transmission planning standards and the CAISO Planning Standards. If NERC were to find the CAISO out of compliance with NERC standards, the violations would likely be considered "severe" and could result in penalties of up to \$1 million per day per violation.<sup>27</sup> Failure to address these issues would put South Orange County customers at an unacceptable risk of load loss, which will continue to increase as load grows in the area.

ii. *The "No Project Alternative" with the Additional System Upgrades Proposed by Frontlines and SJC is Infeasible and Environmentally Inferior to the SOCRE Project.*

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<sup>24</sup> Exhibit CAISO-502, p. 6 (*See* Table 2, Contingencies Type1-B1 and Type1-B2).

<sup>25</sup> Exhibit CAISO-502, p. 6 (*See* Table 2, Contingencies Type2-B1 and Type2-B2).

<sup>26</sup> SJC Application, p. 9-10.

<sup>27</sup> Exhibit ORA-227, p. 18.

To address the numerous reliability concerns outlined above and explained in greater detail in the record, the No Project Alternative would need to be supplemented with significant improvements to the South Orange County 138 kV network and the Talega Substation, at added cost to ratepayers. Frontlines and SJC agree that significant additional improvements to the South Orange County transmission system would be necessary to address the CAISO-identified reliability concerns.<sup>28</sup> Specifically, Frontline and SJC state that all CAISO-identified reliability concerns will be met if the No Project Alternative is interpreted to include:

- Reconductoring the South Orange County 138 kV transmission lines (TL13835, TL13816, TL13836, TL13846);
- Reconfiguring the Pico Bus by moving TL13846 from the East Bus to the West Bus, and moving TL13833 from the West Bus to the East Bus.
- Removing the two aged transformers at Talega and replacing with a high capacity transformer.
- Replacing the Talega STATCOM
- Rebuilding Capistrano Substation.<sup>29</sup>

The CAISO notes that these improvements are not feasible because SDG&E cannot replace the transformers at Talega Substation and still maintain reliable service. Further, because Talega is the only high capacity source to the South Orange County system, SDG&E cannot replace the two aged transformers at Talega with a high capacity transformer without violating NERC standard TPL-002-0b and imprudently placing all of SDG&E's approximately 300,000 customers at risk of a potential single transformer outage during months of construction work.<sup>30</sup> For this reason, SDG&E considered building a temporary substation configuration to serve the load during the construction, but rejected this alternative due to its high estimated cost and the environmental concerns discussed in SDG&E's Proponent's Environmental Assessment (PEA). This minimal work strategy is not cost effective compared with the SOCRE Project, which not only meets the identified reliability needs but also eliminates the sole transmission source issue.

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<sup>28</sup> SJC Application, p. 11.

<sup>29</sup> Frontlines Application, p. 13; SJC Application, p. 11. (Note that the additional improvements proposed by Frontlines and SJC are worded differently, but the full list is generally the same).

<sup>30</sup> Exhibit SDGE-3.2R, p. 19.



Furthermore, the “No Project Alternative” as modified by Frontlines and SJC would be environmentally inferior to the SOCRE Project. FEIR Alternative B4 contemplated improving and/or reconductoring the 138 kV system (TL13816, TL13833, 16 TL13835, TL13836, and TL13846 – *i.e.*, the same lines discussed in the Frontlines and SJC “No Project Alternative”).<sup>31</sup> Alternative B4 also included rebuilding the existing 138 kV Capistrano Substation and replacing the aged transformers at Talega Substation. Essentially, the “No Project Alternative” proposed by Frontlines and SJC is equivalent to the FEIR’s Alternative B4. The FEIR found that Alternative B4 would result in *greater* environmental impacts than the Proposed Project.<sup>32</sup> The Commission correctly decided that the No Project Alternative is infeasible because it fails to address all reliability concerns and it fails to provide a second transmission source to South Orange County, but even if the “No Project Alternative” advanced by Frontlines and SJC was feasible, it would not change the outcome of this proceeding because the SOCRE Project is environmentally superior to the “No Project Alternative” as proposed by Frontlines and SJC.

In summary, the “No Project Alternative” with the additional improvements required to meet reliability requirements is both infeasible and environmentally inferior to the SOCRE Project.

### **C. Alternative J**

#### *i. D.16-12-064 Properly Finds Alternative J to be Technologically and Temporally Infeasible.*

FEIR Alternative J proposes to meet project objectives by connecting the South Orange County 138 kV transmission system to second 230 kV transmission source at Southern California Edison Company’s (SCE) Trabuco Substation. D.16-12-064 finds that Alternative J is temporally infeasible because it could delay project implementation while the CAISO studies reliability concerns raised by interconnecting the SCE and SDG&E transmission systems.<sup>33</sup> The CAISO agrees with the analysis in the Decision. As previously explained by the CAISO, the interconnection proposed in Alternative J is electrically distinct from the SOCRE Project the CAISO approved in the 2010-11 transmission plan. Put simply, Alternative J is a project that

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<sup>31</sup> FEIR, Description of Alternatives, p. 3-10.

<sup>32</sup> FEIR, Comparison of Alternatives, p. 5-3; p. 5-15. (“Alternative B4 would result in impacts on air quality and cumulative impacts that are greater than the proposed project. This alternative would not increase capacity of the South Orange County 138-kV system as substantially as the proposed project because a new 230-kV source to South Orange County would not be constructed.”)

<sup>33</sup> D.16-12-064, p. 28.

would have to be approved through the CAISO transmission planning process, and it is not a CAISO-approved transmission project. Therefore, it cannot be treated as such under the CAISO tariff. For Alternative J to qualify as a CAISO-approved project, the CAISO would need to comprehensively study Alternative J as a potential transmission solution to an identified reliability need consistent with the process specified in its tariff.<sup>34</sup>

SJC asserts that the CAISO has already conducted this analysis during the course of this proceeding.<sup>35</sup> The CAISO only conducted a preliminary analysis of Alternative J during this proceeding, but this abbreviated analysis is not a replacement for a full analysis and vetting through the CAISO's transmission planning process. The CAISO transmission planning process spans the course of an entire year, and the CAISO rigorously vets projects with stakeholders who may be impacted by the outcome. The CAISO had only weeks to review and test Alternative J in this proceeding. Alternative J is temporally infeasible because project construction would be delayed by at least one year, as the CAISO reviews it through the transmission planning process. The delay could extend beyond a year if the CAISO did not approve Alternative J, which is a likely outcome, given the reliability concerns the CAISO has already identified with such option, as discussed in greater detail below.

*ii. CAISO Analysis Demonstrates that Alternative J Does Not Meet Reliability Needs.*

Based on the CAISO's preliminary analysis, it is clear that the Alternative J would have significant negative impacts on the southern California transmission system. The CAISO previously addressed the infeasibility of Alternative J based on its significant limitations on operational flexibility on the 230 kV system that links the Los Angeles basin and San Diego.<sup>36</sup> Put succinctly, Alternative J significantly reduces the transfer capacity on the 230 kV system connecting Los Angeles and San Diego because it puts the weaker South Orange County 138 kV system in parallel with the 230 kV system. The 230 kV system can currently provide transfer capacity up to 2440 MW northbound and 2200 MW southbound. Based on record evidence,

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<sup>34</sup> See CAISO Opening Comments on the Proposed and Alternate Proposed Decision, p. 10 ("The CAISO also notes that the impacts on the SCE system have not been fully studied; the impacts already identified by the CAISO merely represent the minimum impacts that might be expected. Any Alternative J variant approved by the Commission would need to go through the CAISO's full transmission planning process to consider the system-wide consequences of such a configuration.")

<sup>35</sup> SJC Application, p. 17.

<sup>36</sup> CAISO Opening Comments on Proposed and Alternative Proposed Decision, p. 5-9

Alternative J would reduce northbound transfer capacity on the 230 kV corridor by approximately 1,000 MW, a 41% reduction.<sup>37</sup> This would reduce the transfer capability to about 1400 MW, a level that that the corridor has already experienced to date.<sup>38</sup> Southbound transfer capacity would be reduced by 600 MW, representing a 27% reduction. Thus, Alternative J imprudently jeopardizes overall grid flexibility in an attempt to solve sub-regional reliability issues.

Intervenors commented that these reliability concerns can be addressed using a special protection system (SPS). SJC asserts that a “simple” SPS can address these concerns.<sup>39</sup> However, SJC never proposed a specific SPS in the record of the proceeding, nor did it provide any evidence regarding the effectiveness or feasibility of such an SPS. Nonetheless, the CAISO notes that an effective SPS would need to monitor at least five transmission system elements, thus exceeding the maximum number of elements that may be monitored under the CAISO Planning Standards, which were established to ensure the reliability of the SPS operation. Based on this information alone, an SPS is infeasible.<sup>40</sup> The “simple” SPS described by SJC fails to address credible Category C (now known as P7) contingencies and therefore does not meet the requirements of Western Electricity Coordinating Council’s Remedial Action Scheme Design Guide. Further, overly simplifying monitoring can lead to SPS tripping of transmission elements when system conditions do not require tripping. Unnecessarily weakening the system in this way would put the CAISO at risk of non-compliance with NERC Standard TPL-001-4. Moreover, the SPS previously proposed by SJC and Frontlines to mitigate the single Trabuco transformer overload issue created by Alternative J would not be valid if the second Trabuco transformer is in service because adding a second transformer, would increase loop flow concerns. Thus, the SPS would not maintain reliability.

Alternative J is not technologically feasible because it causes significant reliability impacts on the South Orange County 138 kV system and the SCE transmission system.

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<sup>37</sup> Transfer capacity would be reduced to 1470 MW (Tr. at p. 338, ln. 2-8) from the current 2440 MW transfer capacity.

<sup>38</sup> Tr. at 323:2-7; Tr. at 338:2-6.

<sup>39</sup> SJC Application, p. 17.

<sup>40</sup> Exhibit ORA-227, p. 10 (*See* ISO SPS6); *See also* CAISO Reply Comments on the Revised Proposed Decision and Revised Alternate Proposed Decision, p. 5; WECC Remedial Action Scheme Design Guide p. 10-11, <https://www.wecc.biz/Reliability/Remedial%20Action%20Scheme%20Design%20Guide.pdf>.

**D. Alternative F is Infeasible and Does not Meet Project Objectives.**

D.16-12-064 rejects Alternative F because it fails to provide a second 230 kV transmission source into the South Orange County area and has greater environmental impacts than the SOCRE Project. The CAISO agrees that Alternative F should be rejected and adds that Alternative F is infeasible and fails to meet project objectives. The CAISO provided uncontroverted evidence that Alternative F, even as modified by SJC, fails to address reliability concerns on the South Orange County area. The CAISO analyzed Alternative F (as modified by SJC) and found five overloads based on Category C contingencies.<sup>41</sup> The CAISO also found one Category D contingency that resulted in cascading outages at Rancho Mission Viejo Substation.<sup>42</sup>

The CAISO also performed an additional long-term sensitivity case with a very moderate load growth forecast and determined that Category C overloads would increase over time.<sup>43</sup> Based on this sensitivity case, SJC’s modified Alternative F would result in nine thermal overload concerns on five separate elements caused by six different contingency combinations.<sup>44</sup> In comparison, based on the same load forecast, the SOCRE Project results in no thermal overloads over the same time frame. The modified Alternative F proposed by SJC could not mitigate the reliability concerns by implementing a SPS because it would trigger an exceedingly complex SPS that would not meet the CAISO Planning Standards. Alternative F, even as modified by SJC, is merely a short-term solution that would require more transmission system improvements over a shorter time period than the SOCRE Project. The Commission should clarify that Alternative J fails to meet Project Objective No. 1 and is electrically infeasible.

**E. D.16-12-064 Appropriately Considers Compliance with Mandatory Transmission Planning Standards.**

Frontlines asserts that the Commission “conjures an entirely new project objective” by referencing North American Electric Reliability Corporation (NERC) and CAISO transmission planning standards in its review of project alternatives.<sup>45</sup> Frontlines appears to argue that by reviewing compliance with mandatory planning standards, the Commission created a new project

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<sup>41</sup> Exhibit CAISO-504, p. 4-6.

<sup>42</sup> Id. at p. 7.

<sup>43</sup> Id at. p. 7-11.

<sup>44</sup> Id. at p. 7.

<sup>45</sup> Frontlines Rehearing Application, p. 3.

objective and thereby illegally “vitiating” the environmental impact review process. This assertion is both legally and logically inaccurate.

Frontlines’ assertion is legally inaccurate because the FEIR specifically drafted Project Objective No. 1 to include compliance with NERC and CAISO transmission planning standards. Project Objective No. 1 states that the proposed project should “[r]educe the risk of instances that could result in the loss of power to customers served by the South Orange County 138-kV System through the 10-year planning horizon.”<sup>46</sup> The FEIR specifically tied Project Objective No. 1 to compliance with NERC and CAISO transmission planning standards. The FEIR notes that “[i]n drafting this objective, the CPUC first considered the risk of noncompliance with an adopted NERC, WECC, or CAISO transmission planning standard within the 10-year planning horizon.”<sup>47</sup> The FEIR Alternatives Screening Report reviewed project alternatives for compliance with NERC and CAISO planning standards on the basis that such compliance would reduce the risk of power loss in South Orange County.<sup>48</sup>

Furthermore, compliance with NERC and CAISO planning standards is a logical outgrowth of Project Objective No. 1. The purpose of the NERC transmission planning standard is to “establish Transmission system planning performance requirements within the planning horizon to develop a Bulk Electric System (BES) *that will operate reliably over a broad spectrum of System conditions* and following a wide range of probable Contingencies.”<sup>49</sup> Reliable operation of the transmission system is necessary to reduce instances of power loss consistent with Project Objective No. 1.

Compliance with NERC and CAISO planning standards was explicitly and correctly considered as an integral component of Project Objective No. 1. This objective was clearly defined early in the environmental review process and was not a surprise for any person involved in this proceeding. Commission properly defined Project Objective No. 1 based on compliance with NERC and CAISO planning standards and developed a reasonable range of alternatives based on the this project objective.

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<sup>46</sup> FEIR, p. ES-2.

<sup>47</sup> FEIR, Exhibit 1, p. 1-8.

<sup>48</sup> FEIR, Appendix A, p. 1-17 (The CPUC’s review of the proposed project, its objectives, and alternatives includes consideration of the NERC, WECC, and CAISO transmission planning standards that the applicant referenced when defining the need for the proposed project, as discussed in the following section. The objectives of the proposed project as defined by the CPUC for CEQA review purposes (see Section 1.3) are based, in part, on the following review of transmission planning standards.”)

<sup>49</sup> Exhibit ORA-211.

#### **IV. Conclusion**

For the reasons stated above, D.16-12-064 relies on substantial evidence in the record to support its approval of a CPCN for the SOCRE Project. The Commission should affirm the decision and reject the applications for rehearing.

Respectfully submitted

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