

Application No.: 15-04-013

Exhibit No.: _____

Witness: John Phipps

In the Matter of the Application of Southern
California Edison Company (U338E) for a
Certificate of Public Convenience and Necessity
for the RTRP Transmission Project

Application 15-04-013
(Filed April 15, 2015)

**TESTIMONY OF JOHN PHIPPS
ON BEHALF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Date: June 24, 2019

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1 Riverside (Riverside) and (2) the ability to simplify and automate dispatch for
2 Riverside generation units.

3 **II. RTRP OPERATIONAL BENEFITS**

4 **Q. Please explain how CAISO access to generation resources in Riverside is**
5 **currently limited.**

6 **A.** As Riverside mentioned in its direct testimony, the Riverside Energy Resource
7 Center (RERC) generation resources are owned and operated by Riverside. The
8 RERC resources are used both (1) to meet Riverside's resource adequacy
9 requirements and (2) to manage overloading on Riverside's Vista 230 kV
10 substation. The CAISO and Riverside are subject to an agreement, which was
11 approved by the Federal Energy Regulatory Commission (FERC), to manage use of
12 the RERC generation assets to meet the dual system and local area needs.
13 According to this agreement, the RERC units are subject to a variance that provides
14 Riverside with dispatch control over the RERC generation during high load
15 conditions in its local area (*i.e.*, when Riverside area loads exceed 400 MW). This
16 means that RERC unit dispatch is controlled by Riverside to alleviate local issues
17 rather than the CAISO's security constrained economic dispatch.

18
19 **Q. Please explain how the CAISO manages these limitations on RERC generation**
20 **dispatch.**

21 **A.** As a result of the variance provided by the FERC-approved agreement between the
22 CAISO and Riverside, Riverside controls dispatch of the RERC units during high
23 load events and the CAISO markets do not have access to these resources. During
24 these events, the CAISO can only gain access to the RERC resources by calling
25 Riverside and asking it to provide unloaded generation to the CAISO.

26

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1 **Q. Please explain how the RTRP will increase CAISO's access to generation**
2 **resources within Riverside.**

3 **A.** Once the RTRP is operational, it will relieve constraints on Riverside's system and,
4 as explained in Riverside's direct testimony, the RERC generation variance will be
5 rescinded.¹

6
7 **Q. Please explain how the CAISO will dispatch the RERC generation once the**
8 **variance is rescinded.**

9 **A.** Once the variance is rescinded, the CAISO will dispatch the RERC generation
10 based on its market software, without any variance. As a result, dispatch will be
11 optimized to serve the full CAISO system based on a security constrained economic
12 dispatch. In addition, the CAISO will not need to conduct manual coordination with
13 Riverside during high-load events.

14
15 **Q. What benefits will be provided by removing dispatch limitation on the RERC**
16 **generation.**

17 **A.** Removing the dispatch limitations will provide economic benefits by allowing the
18 CAISO market to dispatch the RERC generation during high load events to meet
19 system and flexibility needs. In addition, removing the limitation will provide
20 operational benefits by replacing manual dispatch procedures with the CAISO's
21 automated market dispatch. This will save CAISO operators time and resources by
22 allowing the CAISO to efficiently operate the transmission system.

23 **III. CONCLUSION**

24 **Q. Please summarize your testimony.**

25 **A.** The RTRP will provide system operational benefits by allowing the CAISO full
26 dispatch control over the RERC generation units to serve system, local, and

¹ Riverside Direct Testimony, p. 58:3-7.

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1 flexibility needs. Allowing the CAISO full operational control will provide more
2 efficient market dispatch and real-time operations.

3

4 **Q. Does this conclude your testimony?**

5 **A.** Yes, it does.