

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

In the Matter of the Application Of
SOUTHERN CALIFORNIA EDISON
COMPANY (U338E) for a Certificate of
Public Convenience and Necessity: Eldorado-
Lugo-Mohave Series Capacitor Project.

Application 18-05-007

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION TO MODIFY THE PROCEDURAL
SCHEDULE**

Pursuant to the Commission's Rule of Practice and Procedure 11.1 and Administrative Law Judge Jungreis' October 31, 2019 email granting an extension of the procedural schedule for opening and rebuttal testimony, the California Independent System Operator Corporation (CAISO) hereby submits this motion to extend the date for evidentiary hearings, or, in the alternative, to provide an additional date for evidentiary hearings to receive testimony from the CAISO's witnesses.

I. Background

The Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) originally provided that intervenor opening testimony and rebuttal testimony would be served on October 25, 2019 and November 8, 2019, respectively, and that evidentiary hearings would take place on December 2-4, 2019. Based on two separate requests from parties, the dates for opening and rebuttal testimony were ultimately extended to November 4, 2019 and November 18, 2019. No parties opposed the extensions, though the CAISO noted that the second extension warranted a one-week extension in the evidentiary hearing dates and Southern California Edison Company (SCE) supported second extension provided that the Commission could accommodate a one-week extension in the evidentiary hearing dates.

II. Motion to Modify the Procedural Schedule

The CAISO presents a both primary and an alternative request to modify the procedural schedule, both of which are discussed in more detail below. The CAISO's request to modify the schedule is based on two drivers: (1) the lack of time between service of testimony and the

currently scheduled evidentiary hearings, and (2) the CAISO's witness unavailability during the week of December 2, 2019. The CAISO's primary request—to extend the dates for evidentiary hearings—would address both issues. The CAISO's alternative request—to schedule an additional evidentiary hearing date for CAISO witnesses—would only address the CAISO witness unavailability.

A. Primary Request

The CAISO's primary request is to extend the evidentiary hearing dates by one week, from December 2-4 to December 9-11. Extending the evidentiary hearing date is warranted based on the extensions to the due dates for pre-filed testimony. The original Scoping Memo provided 12 business days over three work weeks between the service of rebuttal testimony and the opening day of evidentiary hearings.¹ The current schedule provides only seven business days over two work weeks, one of which includes the Thanksgiving holiday. The CAISO believes that this provides insufficient time to prepare for evidentiary hearings and requests that the Commission extend the date for evidentiary hearing hearings by one week, to December 9-11.

The CAISO polled parties via email regarding this request and no party opposed extending the date for evidentiary hearing as proposed above. NextEra Energy Resources, LLC (NEER) supported the extension. Both SCE and NEER indicated a preference for extending the evidentiary hearing date rather than the CAISO's alternative presented in subsection B. Several parties did not respond to the CAISO's request.

The CAISO is also open to extending the evidentiary hearing dates beyond December 9-11, though it has not polled parties regarding additional dates. If the Commission finds an extension is warranted, but the specific dates proposed are not workable, the CAISO recommends convening a status conference to establish alternative dates for evidentiary hearings.

B. Alternative Request

As an alternative, the CAISO requests that the Commission establish an additional hearing date to receive testimony from and provide for cross-examination of the CAISO's witnesses. The CAISO's policy witness, Mr. Neil Millar, has an unavoidable conflict and will be

¹ This count includes only full business days and excludes Veterans Day, Thanksgiving Day and the Friday following Thanksgiving.

out of the country during the week of December 2nd. As the CAISO's Executive Director for Infrastructure Development, Mr. Millar is uniquely qualified to present testimony regarding need for the proposed project. Due to Mr. Millar's unavailability during the week of December 2nd, the CAISO respectfully requests to add an additional hearing date to receive testimony from the CAISO's witnesses. The CAISO is flexible as to the exact date for additional evidentiary hearings, provided that it is outside of the week of December 2nd.

No parties opposed this alternative request, however SCE and NEER preferred the primary request discussed in subsection A. The Public Advocates Office noted that it did not oppose this alternative, but would prefer that the additional date was no later than the second week of December.

III. Conclusion

The CAISO respectfully requests that the Commission modify the procedural schedule to extend the date for evidentiary hearings by one week, from December 2-4 to December 9-11. In the alternative, the CAISO requests that the Commission establish an additional evidentiary hearing date to receive testimony from CAISO witnesses.

Respectfully submitted,

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