

**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 for the RTRP Transmission
Project

A.15-04-013
(Filed April 15, 2015)

**REPLY BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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The California Independent System Operator Corporation (CAISO) submits its reply brief in this proceeding pursuant to Rule 13.11 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), and the *Assigned Commissioner’s Scoping Memo and Ruling* issued in this proceeding on December 20, 2018 (Ruling).¹

I. INTRODUCTION

In its opening brief, the CAISO explained that it fully supports the Riverside Transmission Reliability Project (RTRP) to serve public convenience and necessity consistent with California Public Utilities Code (PUC) Section 1001 and recommended that the Commission grant Southern California Edison Company’s (SCE) application for a certificate of public convenience and necessity (CPCN). Despite the CAISO’s support for the RTRP, the California Public Advocates Office (PAO) argues in its opening brief that the Commission should reject SCE’s CPCN and “give great weight to the CAISO’s non-support” for the proposed project. PAO further suggests that SCE should have requested a “new appraisal” of the project from the CAISO due to changing system conditions in recent years. PAO’s claims should be rejected on both substantive and procedural grounds. The CAISO fully explained the basis for its support for the RTRP in its opening brief and the Commission is required to make factual findings based on evidence in the record, not mere speculation regarding opposing parties’ motivations.

¹ As modified by the Administrative Law Judge’s April 11, 2019 email Ruling extending the procedural schedule.

II. DISCUSSION

A. The Evidentiary Record Supports Finding that the RTRP Serves the Public Convenience and Necessity.

The CAISO outlined the factual bases for its support for the RTRP in opening briefs. Based on the evidence produced in this proceeding, the RTRP serves the public convenience and necessity by (1) providing transmission capability to meet Riverside’s existing and future load; (2) providing Riverside with a second point of interconnection to the bulk electric system; and (3) allowing the CAISO to more efficiently dispatch internal Riverside generation. The CAISO only provided testimony regarding the last of these benefits, primarily because the CAISO is uniquely situated to testify to the operational benefits provided by the RTRP.

In contrast, SCE and the City of Riverside (Riverside) are better suited to describe the needs associated with serving Riverside’s load and providing a second point of interconnection. SCE and Riverside conclusively showed that without the RTRP, Riverside would continue to be subject to significant potential outages due to the loss of facilities at the Vista Substation. Based on the evidentiary record, the CAISO agrees with SCE and Riverside that the RTRP will serve the public convenience and necessity.

PAO suggests that SCE should have “reengage[d] with the CAISO on the need for this project” due to the “significantly changing landscape of energy generation and load reduction technologies.”² However, PAO does not explain why such “reengagement” would be necessary or beneficial. CAISO approval for the RTRP is not necessary, as the project is not designed to meet North American Electric Reliability Corporation (NERC) transmission planning standards or other CAISO tariff requirements. Instead, the RTRP is necessary to provide reliable service consistent with SCE’s Transmission Owner Tariff (TO Tariff). As SCE explained in testimony, its TO Tariff obligates SCE to interconnect municipal utilities such as Riverside “if the wholesale interconnection is to the transmission system.”³ SCE also notes that “such interconnection must be consistent with, among other things, Good Utility Practice (as defined by SCE’s [TO Tariff]).”⁴ SCE’s TO Tariff governs the process for determining how to

² *Public Advocates Office’s Opening Brief on the Application and Amended Application of Southern California Edison Company for a Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project [Public]*, (September 27, 2019), p. 8.

³ Exhibit SCE-01 (Holdsworth), p. 12:14-16.

⁴ Id. at p. 12:16-19.

interconnect municipal utilities and other wholesale electricity customers and the CAISO does not approve such interconnections.

B. The Commission Must Make Findings of Fact Based on the Evidentiary Record.

PAO argues that the Commission should give “great weight” to the CAISO’s purported “non-support” for RTRP. PAO’s argument rests on a flawed premise, because the CAISO supports the RTRP as explained above. However, the CAISO also notes that PAO’s recommendation to place “great weight” on an intervenor’s lack of testimony on a particular subject is contrary to the California Public Utilities Code (PUC). Specifically, PUC section 1757 provides that Commission decisions are subject to judicial review to determine whether the findings in the decision “are not supported by substantial evidence in light of the whole record.”⁵ PAO asks the Commission to ignore the record and, instead, to make factual findings based on PAO’s erroneous perception of the CAISO’s position. Intervenors have no obligation to address all issues in testimony and the Commission cannot support factual findings based on an intervenor’s decision not to address a particular issue.

III. CONCLUSION

The CAISO reiterates its support for the RTRP and recommends that the Commission approve SCE’s CPCN Application to build the project.

Respectfully submitted

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⁵ California Public Utilities Code, Section 1757(a)(4).