



March 16, 2018

via electronic mail

David Olsen
Chair, CAISO Board of Governors
P.O. Box 639014
Folsom, CA 95763

Re: Support for Unconditional Approval of Moorpark-Pardee 230 kV No. 4 Circuit Project in the 2017-2018 Transmission Plan

Sierra Club and the California Environmental Justice Alliance (“CEJA”) write to urge the CAISO Board to unconditionally approve the proposed Moorpark-Pardee 230 kV No. 4 Circuit Project (“Moorpark Transmission Project”) recommended for approval in the 2017-2018 Transmission Plan. As determined in the Transmission Plan, the Moorpark Transmission Project “is the most effective and economic alternative in addressing the voltage stability limit and thermal loading impacts of the critical Moorpark sub-area contingency.”¹ As CAISO is aware, the proposed Puente power plant had originally been contracted to meet local area need and posed significant environmental justice, sea level rise, and biological resource concerns. In contrast, extending a new transmission line on existing transmission towers is an efficient use of the built environment with minimal environmental impact.

In comments on the Transmission Plan, some stakeholders suggested approval of the Moorpark Transmission Project should be contingent on the results of SCE’s planned solicitation for local area resources in the Moorpark sub-area to first determine whether in-basin resources can fully meet local capacity need.² However, conditional approval of the Moorpark Transmission Project would create uncertainty in SCE’s ultimate procurement target, potentially result in an inability to finalize contracting for selected resources, and ultimately compromise the success of SCE’s efforts to meet local area need without resorting to new gas-fired generation. Accordingly, as recommended in the Transmission Plan, we request the CAISO Board *unconditionally* approve the Moorpark Transmission Project.

¹ 2017-2018 Revised Draft Transmission Plan (Mar. 14, 2018), pp. 195-96.

² CESA, Stakeholder Comments 2017-2017 Draft Transmission Plan (Feb. 22, 2018). *See also* NRG Energy, Transmission Planning Process Comments (Feb. 22, 2018) (reliability enhancements should focus on local generation).

We very much appreciate CAISO's engagement in exploring alternatives to Puente. It is now time to move forward with the development of alternatives. CAISO's unconditional approval of the Moorpark Transmission Project will help ensure Oxnard can move past a legacy of disproportionate resource siting and enable SCE to move forward with its plans to procure preferred resources to meet remaining local area need.

Thank you for your consideration of these comments.

Respectfully,

/s/ Matthew Vespa

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