

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

City of Alameda, California)	
v.)	Docket No. EL20- 63
Pacific Gas and Electric Company)	

**MOTION TO INTERVENE AND COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO) respectfully moves to intervene and submits these comments on the Petition for Declaratory Order and Complaint (PDO Filing) of the City of Alameda (Alameda) on August 10, 2020, in the captioned docket.¹

I. BACKGROUND

In the 2017-2018 transmission planning process, the CAISO identified P2 and P6 contingencies on the Oakland 115 kV system without local generation.² In the transmission planning process request window, Pacific Gas & Electric Company (PG&E) proposed the Oakland Clean Energy Initiative (OCEI) to address these reliability needs. The OCEI addressed these needs relying on a combination of transmission system upgrades, energy efficiency, and clean energy resources. The

¹ The CAISO moves to intervene and submits these comments pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214 (2015), and Commission's notice in this docket.

² CAISO 2017-2018 Transmission Plan, p. 124 (March 22, 2018).

OCEI also relied on the transfer of Alameda load from Cartwright to Jenny during peak load conditions and after an N-1 event, in preparation for an N-1-1 event.³ A load transfer following the first contingency is an acceptable system adjustment in preparation for the subsequent contingency of an N-1-1 event under the reliability standards. The OCEI would also allow replacement of an old fossil fuel power plant in the City of Oakland, California.

In the 2017-2018 annual Transmission Plan, the CAISO approved the OCEI as the more efficient or cost-effective solution to meet the identified reliability need consistent with its Order No. 1000 compliant tariff. The estimated total cost of the OCEI project was \$102 million, compared to the costs of the other alternatives the CAISO considered, which ranged from \$367-\$574 million.⁴ The CAISO found the OCEI addressed all of the reliability issues identified in the Oakland local area without local generation.⁵

Alameda's PDO Filing states that, absent additional transmission improvements, the OCEI would place an undue and discriminatory burden on Alameda by increasing the circumstances in which PG&E can call on Alameda to transfer load and requiring Alameda to maintain 24/7 staffing at its control center. Alameda requests the Commission issue a declaratory order finding that a 2011 Operating Agreement between Alameda and PG&E provides no basis for PG&E to require Alameda's participation in the OCEI. Alameda also requests the Commission find the proposed

³ *Id.* at 128.

⁴ *Id.* at 129.

⁵ *Id.*

OCEI constitutes a Significant Operational change as that phrase is defined in a 2015 Interconnection Agreement between Alameda and PG&E. Alameda also states that because PG&E's Special Protection System at the Oakland-C substation is programmed to drop Alameda load during certain contingencies, while PG&E's retail load connected to the same sub-station is not subject to load dropping, PG&E's treatment of Alameda is unduly discriminatory.

II. MOTION TO INTERVENE

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, CA 95630. The CAISO is the balancing authority responsible for the planning and reliable operation of the electric grid comprising the transmission systems of a number of transmission owners including PG&E; administers the generator interconnection procedures applicable to those facilities; and operates energy and ancillary services markets.

The CAISO requests the Commission allow it to intervene in this proceeding. Alameda's PDO Filing pertains to a project the CAISO approved through its annual transmission planning process to meet an identified reliability need. Action on the PDO Filing could affect the status and efficacy of the OCEI project and the CAISO's ability to timely address reliability concerns. Because the PDO filing affects the CAISO and CAISO customers, the CAISO has a direct and substantial interest in the proceeding. Because no other party can adequately represent the CAISO's interests in the

proceeding, the CAISO's intervention is in the public interest, and the Commission should grant the intervention.

III. COMMENTS

As indicated above, the CAISO determined the OCEI Project constitutes the more efficient and cost effective solution to meet an identified reliability need. Parties have relied upon the Board's approval of the OCEI project more than two years ago and have begun activities in connection with the project. Accordingly, the CAISO requests the Commission issue an order on the PDO Filing as soon as possible. If the Commission finds PG&E cannot rely on the load transferring capability, as proposed in the OCEI Project, the CAISO will need to revisit this matter in a future transmission planning cycle and assess alternatives to meet the reliability need.

IV. COMMUNICATIONS

The CAISO requests that all communications and notices regarding this filing and these proceedings be provided to the following:

Anthony J. Ivancovich Deputy General Counsel Jordan Pinjuv Senior Counsel California Independent System Operator Corporation 250 Outcropping Way Folsom, CA 95630 aivancovich@caiso.com jpjuv@caiso.com

V. CONCLUSION

For the reasons explained above, the CAISO requests the Commission grant its motion to intervene, consider its comments, and act promptly to resolve the issues in this proceeding.

Respectfully submitted,

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Dated: September 9, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom this 9th day of September, 2020.

/s/ Anna Pascuzzo

Anna Pascuzzo