

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

In the Matter of the Application of San Diego Gas  
& Electric Company (U 902 E) for a Certificate of  
Public Convenience and Necessity for the Sunrise  
Powerlink Transmission Project

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Application 06-08-010  
(Filed August 4, 2006)

**MOTION OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR CORPORATION FOR  
EXTENSION OF TIME TO CONDUCT  
ADDITIONAL EVALUATIONS  
OF ALTERNATIVE SCENARIOS**

April 20, 2007

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The California Independent System Operator Corporation (CAISO), in accordance with Rule 45 of the Rules of Practice and Procedure, hereby moves that the Commission grant an extension of time, beyond the April 20, 2007 completion date established in the January 26, 2007 ACR/ALJ Ruling, for the CAISO to evaluate additional alternative scenarios for the interveners and for the Commission's environmental consultants. Furthermore, if it is the Commission's intent that the CAISO complete all of the requested follow-up studies and alternative scenarios, the existing procedural schedule must be modified to accommodate this additional work load. This request for an extension of the April 20 submission date and a modified procedural schedule has become necessary for all of the reasons set forth below.

**I. BACKGROUND AND OVERVIEW**

On November 1, 2006, the ACR issued a Scoping Memo directing the CAISO to study alternative scenarios to the Sunrise Powerlink project (Sunrise) proposed by UCAN alternatives and other parties to this case. That Scoping Memo also required SDG&E and the CAISO to file testimony on January 26, 2007 supporting the Sunrise studies and the

study of the alternative scenarios. At the November 14, 2006, testimony workshop in held in San Diego, it was agreed (and later confirmed by the November 22, 2006, ACR/ALJ Ruling) that the parties would have until December 7 to submit proposed alternatives to the CAISO.

Four parties submitted proposals by that date: UCAN<sup>1</sup>, Rancho Penasquitos Concerned Citizens (RPCC), Mussey Grade Road Alliance (MGRA) and LS Power. The Aspen consultants performing the environmental analysis for the Commission also submitted several alternatives for the CAISO to analyze. Additionally, on December 15, 2006, The Nevada Hydro Company (TNHC) sent a letter to the ALJ requesting that the CAISO study the Lake Elsinore Advanced Pump Storage (LEAPS) project as an alternative to Sunrise.

Following a workshop held in Sacramento on December 13, 2006 and the receipt of an updated list of assumption changes and scenarios from UCAN on December 15, the CAISO compiled a summary of alternative proposals and determined that the parties were requesting approximately 46 reliability studies and 55 economic studies, totaling 101 individual studies, that were to be completed by the CAISO before testimony could be prepared and filed on January 26, 2007.

On January 8, 2007, the CAISO filed a Motion for Extension of Time to Complete Studies (Motion for Extension). In that Motion for Extension, the CAISO agreed to make certain adjustments to its base case and complete a year 2015 evaluation of three alternative scenarios for inclusion in its January 26 testimony. As to the rest of the alternative scenarios requested by the parties, the CAISO explained that

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<sup>1</sup> UCAN and CAISO representatives met several times prior to the submission of UCAN proposals on December 7, 2006.

approximately 10 studies could be completed per month. At that rate, all of the studies could be completed and reviewed by June 1, 2007, assuming that some of the scenarios would not need to be undertaken. The CAISO proposed a procedural time schedule that would permit the filing of supplemental CAISO testimony on June 1, the submission of intervener testimony and rebuttal testimony in June or July, and a combined Phase I and Phase II hearing schedule beginning on October 8, 2007.

The ALJ ruled on the CAISO Motion for Extension on January 26, 2007. Although granting the CAISO's overall request for an extension of time and a modification of the original procedural schedule, the January 26 Ruling did not adopt the CAISO's proposed time table. Rather, the CAISO was given until April 20 to complete the parties' alternative scenario studies and to provide the results of those studies. Pursuant to the Ruling, the DRA testimony is scheduled to be filed on May 18 and intervener testimony on June 1. Rebuttal testimony is now due on June 15, and the evidentiary hearings are currently scheduled to begin on July 9.<sup>2</sup>

In light of the shortened time frame adopted by the Commission in the January 26, 2007 Ruling, the CAISO and MRW (the Commission's consultants) immediately began to work with the interveners to develop a shortened and prioritized list of runs that would best assist the parties with the preparation of their direct cases. During numerous discussions and meetings between the CAISO and MRW, it was agreed that some of the approximately 100 requested runs would not need to be completed for various reasons (duplication of cases, obvious reliability failures, etc.).

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<sup>2</sup> The Ruling also addressed the CAISO's second Motion which requested leave to file initial testimony in two stages.

By approximately the end of January, MRW had developed an intervener priority case matrix, outlining 46 priority studies. The CAISO agreed to deliver the raw study results to the interveners in monthly batches, and to attempt the completion of the priority matrix by the end of March, 2007. The CAISO intended to use the rest of the time (April 1-April 20) to review the intervener results and prepare summary tables for uniform presentation of the results on April 20.

As agreed, on approximately February 28 and March 30, 2007, the CAISO delivered the two batches of intervener studies to the interveners. By March 30, 2007, 38 studies had been completed, roughly double the number of monthly studies that the CAISO had predicted it could complete in the January 8, 2007 Motion for Extension.<sup>3</sup>

Toward the end of March, as the CAISO was engaged in completing the scenarios on the priority matrix, Commission staff and MRW presented the CAISO with six additional scenarios, not included on the original list of 101, for study after April 20. During the same time period, MRW and Commission staff also inquired as to whether the CAISO could complete any other intervener studies (notably from UCAN and RPCC) identified on the original list of 101 but not included on the priority matrix (or listed at a very low level). The CAISO responded that there was very little (if any) time available for conducting other studies because of the “packaging” of study results being undertaken for the April 20 filing date. MRW agreed to have discussions with the interveners to develop a short list of runs necessary for their case presentations.

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<sup>3</sup> The CAISO is aware that several interveners (notably RPCC and UCAN) will probably take issue with the CAISO’s characterization of some model runs being “completed”, in light of ongoing discussions as to changes and corrections to the runs that the CAISO will attempt to make as soon as possible. The purpose of this Motion is not to engage in this debate, but to accommodate and assist these interveners.

On April 5 and 6, 2007, MRW presented the CAISO with a follow-up matrix of approximately 14 more runs to be completed for RPCC and UCAN. The CAISO has had several discussions with these parties since that time and understands the scope of the work to be undertaken. However, the CAISO made it clear to MRW, RPCC and UCAN that these runs could not be included in the April 20 submission and would necessitate an extension of the current time schedule beyond the April 20 completion date. The purpose of this Motion for Extension is to provide an estimate of the time that it will take the CAISO to complete the follow-up runs for RPCC and UCAN, “package” those results in the same format that is being used for the April 20 submission, and complete the additional six runs requested by the Commission Staff. As set forth below, the CAISO cannot complete all of the follow-up runs without a modification to the procedural schedule in the case. An alternative time frame—not involving a change to the procedural schedule-- has also been suggested, should the Commission direct MRW and the interveners to substantially reduce the list of additional studies.

## **II. THE CAISO’S PROPOSED SCHEDULE FOR COMPLETING THE ALTERNATIVE SCENARIOS.**

The CAISO has had several conversations with RPCC and UCAN representatives, and made every effort to include at least a portion of the UCAN economic (Gridview) follow-up runs in the April 20 submission. Despite these efforts, however, it will not be possible to address any follow-up runs by April 20, or provide results to UCAN or RPCC. Thus, the CAISO proposes the following time frame for conducting all of the additional studies and presenting the results:

- 1) April 23- May 4: the CAISO should be able to complete and review the UCAN Gridview cases for 2015 and 2010 and provide the raw results to UCAN. Other study results and back-up information will be provided during that time period as well. The CAISO will continue to work with RPCC during this period to develop the plan of service assumptions necessary to create the requested base case.
- 2) May 4-May 14: once the RPCC base case is created, the CAISO will require 5 business days to run the 6 requested RPCC scenarios. Assuming that the base case is completed by May 4, the CAISO can complete the RPCC runs and package the UCAN and RPCC results for submission to the parties and the Commission by May 14.
- 3) After May 14: the CAISO will endeavor to work on the alternative runs requested by Commission Staff.

This schedule reflects the minimum amount of time that the CAISO staff and consultants must spend to complete all of the follow up runs identified by MRW, assuming that no other work is being conducted at the same time. Thus, an extension of time until May 14 substantially cuts down on the time that the CAISO has to prepare rebuttal testimony and conduct hearing preparation. The CAISO anticipates that DRA and the interveners will have similar concerns with the shortened testimony and hearing preparation time that will be caused by this Motion for Extension.

For these reasons, if the Commission determines that all of the follow up studies must be undertaken, the CAISO requests that the overall procedural schedule be modified to accommodate the time necessary for the CAISO to not only complete the follow up

intervener runs but to work on the Commission-requested studies. Based on a May 14 CAISO submission date, the CAISO recommends that the DRA be given until June 8 to file testimony; the interveners should file testimony on June 29, and rebuttal testimony can be filed on July 13. The CAISO suggests that the hearings begin on August 6, or, as recommended in the January 8 Motion for Extension, combined hearings could be scheduled for the October time frame, following the issuance of the EIS/EIR. This modified schedule will permit the CAISO to work on the Commission-requested runs and provide those results in advance of the hearing. It bears repeating that the CAISO cannot do a credible job of completing and packaging the alternative scenarios requested by the interveners and the Commission, preparing rebuttal testimony and participating in the hearing without a change in the current procedural schedule.

The CAISO would note that an additional 3 studies could be conducted and packaged for submission between April 23 and May 1, 2007. This extension of time to produce a limited number of additional studies would not require the modifications to the procedural schedule discussed above.

### **III. CONCLUSION**

As was the case with the January 8 Motion for Extension, the CAISO is well aware that project delays could negatively affect SDG&E's ability to reach its target completion date for Sunrise and impact SDG&E's ability to reach its renewable goals. The extension of time requested in this Motion can be accomplished without putting these target completion dates at risk. Furthermore, the CAISO has worked very diligently to assist the Commission with creating a full record regarding the economic

and reliability implications of the alternatives proposed by the parties, the Commission's Staff and the CEQA consultants. Thus, the CAISO has proposed a modified procedural schedule that will accomplish the Commission's goals and still preserve the completion date for the proceeding. Alternatively, should the Commission agree that the list of "follow-up" runs can be reduced to a manageable level, the CAISO can produce and package three additional runs by May 1 without affecting the procedural schedule. The CAISO's proposal is reasonable and should be approved.

Respectfully submitted,

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**ATTORNEYS FOR THE  
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## CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, a copy of the foregoing Motion Of The California Independent System Operator Corporation For Extension Of Time To Conduct Additional Evaluations Of Alternative Scenarios to each party in Docket No. A.06-08-010.

Executed on April 20, 2007 at Folsom, California.

/s/Susan L. Montana

Susan L. Montana

An Employee of the California  
Independent System Operator

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