

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

Order Instituting Investigation into)
implementation of Assembly Bill 970 regarding) I.00-11-001
the identification of electric transmission and)
distribution constraints, actions to resolve those)
constraints, and related matters affecting the)
reliability of electric supply.)
_____)

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR ON THE
STAFF'S DRAFT REPORT TO THE LEGISLATURE IN COMPLIANCE WITH SB
1038 ELECTRIC TRANSMISSION PLANS FOR RENEWABLE RESOURCES IN
CALIFORNIA**

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Dated: November 17, 2003

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I.00-11-001

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON THE STAFF'S DRAFT REPORT TO THE LEGISLATURE IN
COMPLIANCE WITH SB 1038 ELECTRIC TRANSMISSION PLANS FOR
RENEWABLE RESOURCES IN CALIFORNIA**

The California ISO has reviewed the draft report of the California Public Utilities Commission ("CPUC" or "Commission") Staff to the legislature in response to the requirements of SB 1038 on the above named subject. The draft Staff report was the product of a substantial collaborative process in which the ISO played a major role in helping to establish a process for defining the transmission requirements or needs of renewable resources in California. The ISO would like to commend the CPUC Staff for their effort and professionalism and for providing the opportunity for a meaningful dialogue between the Commission Staff and the ISO. Cooperation between the Commission and the ISO has furthered development of a draft report that is both comprehensive and detailed. It is in that spirit that the ISO offers the following comments.

The ISO also wants to renew its commitment to continued coordination with the CPUC and other State agencies in determining the total transmission and generation-interconnection related resource needs of California. To that end, the ISO is guided by two overarching principles or objectives that are aligned with its statutory obligations as enumerated in Assembly Bill 1890

("AB 1890"). First, the transmission requirements or needs identified for both renewable and non-renewable resources must satisfy the ISO's established *reliability* criteria. Second, the transmission needs or projects associated with the development and interconnection of both renewable and non-renewable resources must further *cost-effective* or *efficient* expansion of the transmission system. Such a demonstration or outcome is, of course, measured by whether the proposed transmission projects are ultimately determined to be both just and reasonable and consistent with the public interest. To that end, the legitimate and perhaps broader goals of state public policy must also be accommodated. It is with these principles in mind that the ISO offers the specific comments outlined below.

I. GENERAL COMMENTS

The ISO has commented previously in this docket, and in fact, provided brief comments on the conceptual renewable resource transmission plans of the three California investor-owned utilities on September 15, 2003. These comments, and the earlier comments by the ISO that are referenced in the September 15th filing, should be considered incorporated herein by reference. Even though the September 15th comments dealt with the individual plans of the utilities rather than with the compilation and analysis contained in the Staff report, the subject matters addressed are the same and thus the ISO's comments bear on the issues addressed herein.

II. SPECIFIC COMMENTS

I. The CPUC Should Proceed Cautiously When Establishing Transmission Pricing Policies for Renewables So As to Ensure Appropriate Expansion of the Transmission System

The ISO has two primary areas for comment in the draft Staff report. The first can be found on page 3, item 4 of the Staff report. The report states:

The present method of participant funding of transmission upgrades maybe incompatible with the small scale of many renewable developers; cooperation with the ISO and IOU's using flexibility recently provided by the FERC, may allow for development of a new method.

The Staff report is quite correct that the standard for transmission upgrade funding caused by the connection of new generation to the transmission system has been participant funding. This means that the incremental or added costs associated with the upgrades to the transmission system are to be borne by the initial cost causer with potential reimbursement of these costs over an appropriate period. To depart from this method for renewables, and "roll" the costs into the rate base of the regulated entity is a departure from existing policy that deserves careful consideration. Such a policy will serve as a strong inducement to renewable generation that may improperly impact the calculus between renewable and nonrenewable generation. Moreover, such a policy has the danger to result in uneconomic expansion of the transmission system. While the ISO acknowledges that, in the end, the cost of new transmission associated with the development of renewable resources must be balanced against both the tangible and intangible benefits of such resources, as viewed from a state public policy perspective, the ISO urges the Commission to establish a process to ensure that such competing interests are balanced.

As the draft report acknowledges, since these issues are the subject of an ongoing and broader FERC proceeding, the ISO recommends that the Commission proceed cautiously so as not to establish inconsistent or incompatible incentives for interconnecting resources and expanding the grid and standards of review.

2. *The CPUC Should Continue to Cooperate With the ISO and the Other State Agencies in Fashioning a Transmission Planning and Siting Process That IS Both Effective and Streamlined*

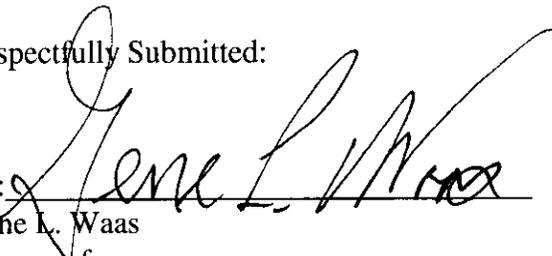
The second area for comment can be found on page 9 of the draft report. In the second sentence of the first paragraph, the Staff states, “ The CPUC has developed a proposal that will establish, in collaboration with the ISO, a methodology for assessing the economic or reliability need for a proposed transmission project.” This sentence relates to the first sentence in the paragraph that speaks of reducing certain redundancies in the transmission needs assessment. Currently, the ISO is the primary party determining the need for an addition or major modification to the transmission system. This is the case because the ISO is responsible, consistent with its statutory responsibilities, for the safe and reliable operation and control of the transmission grid. The Staff report seems to be proposing a change in the relative responsibilities in need determination, but the substance of this change is unclear. The third paragraph on that same page indicates that the CPUC will determine whether the proper economic and reliability criteria have been utilized by the investor-owned utility (“IOU”) proposing the project. The ISO assumes that this determination is to be made by the CPUC in collaboration with the ISO or, more suitably, in deference to ISO determinations of need. The ISO is confident that such concerns can be resolved in consultation with CPUC Staff. Finally, the ISO understands that the CPUC is about to embark on a comprehensive rulemaking regarding this very issue. In addition, the ISO also understands that other state agencies are also intent on addressing these matters.

Notwithstanding the ISO's existing and statutorily-established authority to determine the *need* for new transmission projects that are to become part of the ISO Controlled Grid, the ISO commits to active and cooperative participation in any Commission proceeding or rulemaking whose purpose is to address the fundamental issue or process of transmission planning.

The ISO appreciates the opportunity to comment on the Commission's draft report and, as stated above, is committed to working cooperatively with the CPUC to address matters that impact both ISO operations and CPUC areas of review.

November 17, 2003

Respectfully Submitted:

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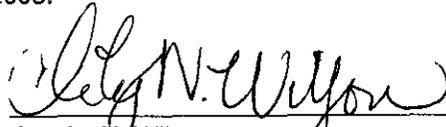
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PROOF OF SERVICE

I hereby certify that on November 17, 2003, I served by electronic and U.S. mail, the Comments of the California Independent System Operator on The Staff's Draft Report to the Legislature In Compliance With SB 1038 Electric Transmission Plans for Renewable Resources in California in Docket # I. 00-11-001.

DATED at Folsom, California on November 17, 2003.


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