

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

In the Matter of the Application of NEXTERA
ENERGY TRANSMISSION WEST, LLC for
a Certificate of Public Convenience and
Necessity for the Suncrest Dynamic Reactive
Power Support Project

Application 15-08-027
(Filed August 31, 2015)

**RESPONSE OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 11.1(e), the California Independent System Operator Corporation (CAISO) submits the following response to the Motion of NextEra Energy Transmission West, LLC (NEET West) for an Interim Commission Decision Granting Public Utility Status (Motion). The CAISO supports NEET West's request for an interim decision on public utility status. The CAISO believes an interim decision will facilitate NEET West's timely permitting and construction of both the Suncrest Dynamic Reactive Power Support Project (Suncrest Project) and the Estrella Substation Project. The CAISO approved these projects in its transmission planning process and awarded them to NEET West through the CAISO's competitive solicitation process.

The Commission's Energy Division Staff has determined that an environmental impact report (EIR) is required for the Suncrest Project. This determination was confirmed in the Administrative Law Judge's Ruling Giving Notice of Anticipated Scope of Issues and Timing of Prehearing Conference issued December 8, 2015 (ALJ Ruling). The ALJ Ruling states that a draft EIR could be released by June 30, 2016 and a final EIR could be released in September 2016. Based on this tentative schedule, it does not appear that a final Commission decision on the Suncrest Project is likely prior to the end of 2016.

Based on the timeline in the ALJ Ruling, the CAISO believes that it would be efficient and productive for the Commission to consider NEET West's request for public utility status separately and on an expedited basis, as recommended in the Motion. Expediting review of NEET West's request for public utility status will facilitate permitting and construction of the Estrella Substation Project by clarifying NEET West's ability to file a permit to construct for that project. The CAISO also believes that addressing the public utility request prior to issuing the EIR will streamline the current proceeding by determining NEET West's request for public

utility status now rather than concurrently with the review of need and environmental impact of the Suncrest Project. The CAISO also believes that expediting the determination of public utility status will better enable NEET West to subdivide and obtain land necessary to complete the Suncrest Project and the Estrella Substation Project.

In summary, an expedited procedural schedule to address NEET West's request for public utility status will provide potential efficiencies in the permitting, construction and completion of both the Suncrest Project and the Estrella Substation Project. As a result, the Commission should grant NEET West's Motion and establish an expedited schedule to review NEET West's request for public utility status.

Respectfully submitted,

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