

**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

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

Application 05-12-014
(Filed December 14, 2005)

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION FOR
EXTENSION OF TIME TO COMPLETE
STUDIES**

January 8, 2007

Anthony Ivancovich, Assistant
General Counsel
Judith B. Sanders, Counsel
California Independent System
Operator
151 Blue Ravine Road
Folsom California 95630
Telephone: (916) 351-4400
Facsimile: (916) 608-7222

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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 modify the procedural schedule set forth in the November 1, 2006 Assigned Commissioner and ALJ Scoping Memo and Ruling (ACR) and extend the date by which the CAISO will complete its evaluation of alternatives to the Sunrise Powerlink (Sunrise) project until June 1, 2007. This modification of the procedural schedule is necessary for all of the reasons set forth below.

I. OVERVIEW

Following the September 13, 2006 prehearing conference, the ACR addressed the nature of this proceeding, the procedural schedule for the case, the testimony to be submitted by San Diego Gas & Electric Company (SDG&E) and the CAISO, discovery and other matters. In particular, the ACR requested that the CAISO submit testimony containing a “comprehensive evaluation of UCAN’s proposed alternatives to the proposed project discussed in UCAN’s PHC statement”. (ACR, 11) Additionally, the CAISO was asked to submit testimony 1) “supplementing its evaluation of the proposed project with a more complete evaluation of wires and non-wires alternatives”; 2) containing a more complete evaluation of the interaction between LEAPS, Tehachapi and

Sunrise; and 3) discussing how these additional “factors” impact the CAISO’s economic analysis based on the Transmission Economic Assessment Methodology (TEAM) methodology. The filing date for the CAISO’s (and SDG&E’s) testimony was established as January 26, 2007.

At the testimony workshop held on November 14, 2006 in San Diego, the CAISO presented its proposed process and timeline for gathering the alternatives to be studied and included in the testimony. The CAISO requested that alternatives be submitted by December 7, 2006, that each alternative to be evaluated fulfill the three objectives met by Sunrise (access to renewables, increased access to economic imports and network reliability) and that the parties be able to provide sufficient engineering information and answer specific questions. (See Preliminary Outline and Description of the CAISO Testimony).¹

The CAISO’s proposed process was largely approved by the ALJ in the November 22, 2006 ruling that set December 7, 2006 as the deadline by which parties were to submit alternative scenarios for the CAISO to study. Four parties submitted

¹ The CAISO also identified the UCAN alternatives that would be studied as follows:

- “Mexico Light”
- South of SONGS Upgrade
- Relocate Central substation to the San Felipe substation site
- Build a 500 kV line roughly parallel to SWPL from IV substation to the Boulevard/Campo area, then build two 230 kV transmission lines from there to the existing SDG&E grid.
- LADWP’s Green Path North (GPN) Project (build a 500 kV line from Riverside County to the Los Angeles area), and take other measures as necessary to meet SDG&E reliability needs.
- Various non-wires alternatives such as Advanced Metering Initiative (AMI), demand response programs, new combustion turbines and the South Bay generation project.

proposals by that date: UCAN², 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.

CAISO staff immediately began to study the alternatives requested by the parties, and participated in the workshop held in Sacramento on December 13, 2006. At the close of the workshop, UCAN agreed to provide the CAISO and the parties an updated list of assumption changes and scenarios based on the workshop discussions, which were provided on December 15, 2006. Having received finalized lists from all the parties proposing alternatives to be studied, CAISO staff worked diligently to compile the summary of alternative proposals attached to this motion (including informal discussions with other parties in addition to UCAN). As can be seen, by final count the parties have asked for 46 reliability studies and 55 economic studies, totaling 101 individual studies that must be completed by the CAISO before testimony can be prepared and filed. Needless to say, it is impossible for the CAISO's staff to accomplish this task in time to file testimony supporting its evaluation of all the alternatives on January 26, 2007. Even using outside consultants and vendors, which the CAISO intends to do, this deadline cannot be met. Thus, the CAISO requests an extension of time to complete the studies and to file staggered testimony supporting its own Sunrise study and explaining the results of the alternative studies. As discussed below, CAISO staff estimates that the studies can be completed and prepared by June, 2007. This estimate is based on the hours

² UCAN and CAISO representatives met several times prior to the submission of UCAN proposals on December 7, 2006.

that must be spent to prepare the base cases necessary to run the computer models and an assumption that some of the alternatives can be eliminated. The CAISO will be able to file initial testimony, supporting its own Sunrise analysis and several alternatives by January 26, 2007, and that supplemental testimony supporting the rest of the studies be filed in late June or early July.

II. PREPARATION AND COMPLETION OF THE ALTERNATIVE STUDIES INVOLVES A MANUAL PROCESS THAT IS VERY TIME-CONSUMING.

As a general matter, the alternatives proposed by each party will require the preparation of a new power flow case and/or new economic case for each one. Changes to the base case prepared by the CAISO for the Sunrise study is a completely manual process that requires consistency during the preparation process. UCAN alone has requested that the CAISO prepare 35 cases (and corresponding 35 economic cases if power flow cases meet reliability planning standards), as described in the attachment. Based on past experience, each of these study cases will take approximately 1 business day to prepare. Once the study cases have been prepared, the computer model can be run by in-house or outside experts. Each reliability run (power flow and/or transient stability analysis) can take up to 1 business day to complete. An economic study case takes an average 8 hour-run to complete (under best case circumstances). Outside vendors can assist the CAISO with producing the computer runs and it is possible that some runs can be processed simultaneously. In addition to performing studies, the CAISO also needs to coordinate with the impacted Participating Transmission Owners (PTO's) for cost estimating of proposed alternatives. Report write-up on both reliability and economic

study results and internal CAISO review can take approximately 4 weeks to complete. The CAISO certainly intends to evaluate the alternatives provided by the parties, as described by the November 1, 2006 Scoping Memo. However, it was not until the CAISO received the finalized list of alternatives from UCAN, as well as the lists from the other parties (LS Power's proposals will involve 13 computer runs), that the CAISO understood the scope of the work to be undertaken and that the procedural schedule would be impacted if all the studies were to be completed. The CAISO will make every effort to streamline the process, and it is entirely possible that certain alternatives will not require economic study because such alternatives will not be feasible from a reliability standpoint. Nonetheless, it is clear that the alternative study process confronting the CAISO will require many months before completion (even if the total number of alternatives to be studied is reduced). As described in the next section, the CAISO proposes to provide the results of its studies in phases, and to complete the entire process by mid to late June.

III. THE CAISO'S PROPOSED SCHEDULE CAN BE ACCOMODATED WITHIN THE EXISTING PROCEDURAL SCHEDULE.

To the extent that the Commission would like the CAISO to complete as many of the alternative analyses as possible, the CAISO proposes to complete the following studies for Year 2015, and file supporting testimony, by January 26, 2007:

- 1) Development of Base Case 0 (reference case) - refinements will be made to the CAISO's original 2015 Heavy Summer (HS) study base case to reflect the updated CEC June 2006 load forecast and updated PTO demand forecasts.

Demand data for SDG&E will be taken from the long-term procurement plan filed in R.06-02-013 and discussed at the December 13, 2006 workshop. The original study will also be updated to include the new Devers-Palo Verde 2 plan of service and updates on the maximum capacity values (Pmax) of the existing Combustion Turbine (CT's) units in SDG&E area per its long-term procurement plan (R.06-02-013).

2) Scenario 1: - Base Case 0 with addition of LADWP's Green Path North Project and the Nevada Hydro Company (TNHC)'s Lake Elsinore Advanced Pumped Storage (LEAPS) Project.

3) Scenario 2 Base Case 0 with addition of South Bay Repowering Project. The existing South Bay Power Plant is assumed to be off-line.³

4) Scenario 3 - Base Case 0 with addition of the Sunrise Powerlink Project.

The results of these studies will be addressed in testimony filed on January 26, 2007, which will also contain a discussion of the analysis approved by the CAISO Board of Governors on August 3, 2006, including updates and refinements to that analysis.

After the completion of these studies, the CAISO anticipates that up to 10 studies can be completed per month (the process will accelerate after the initial study cases and analyses are completed). The CAISO will use best industry practices to create and analyze these scenarios, and findings for each scenario will be documented on a standard

³ The development of both Scenarios 1 and 2 will require additional cost information that could possibly delay the results of this analysis.

evaluation form. A prioritized list of the evaluations to be completed each month will be provided to the Commission and the parties as soon as possible. The CAISO intends to work closely with the Commission and the parties and provide periodic progress reports. Although every effort will be made to streamline the process, at the rate of 10 studies a month, it is clear that the total number of studies must be reduced if the study process is to be completed by June. The CAISO proposes to file supplemental testimony describing the remaining studies (after the January 26, 2007 testimony filing) within four weeks of the completion of the evaluations.

According to the November 1, 2006 Scoping Ruling, SDG&E and CAISO testimony is due to be filed on January 26, 2007, with DRA testimony filed on March 2, 2007, other intervenor testimony filed on March 14, 2007, and all rebuttal testimony filed on March 30, 2007. An evidentiary hearing is scheduled to begin on April 23, 2007, with briefs for Phase I due on June 1, 2007. Phase II will be initiated with the publication of the draft EIS/EIR on August 3, 2007, with direct and rebuttal testimony filed in September and a potential evidentiary hearing beginning on October 8, 2007. After public comments, the final EIS/EIR is scheduled to be published on November 20, 2007 and a Proposed Decision issued in December 2007. The final decision is scheduled for January 2008.

The CAISO suggests that the overall schedule for issuing a final decision in January 2008 will accommodate this modification of the testimony and hearing schedule for Phase I issues by simply combining portions of Phase I and Phase II. The CAISO proposes two general alternatives: the testimony schedule for intervenor and rebuttal testimony can be extended until June and July, 2007 after the CAISO has provided the results of the rest of the studies, or the testimony be staggered throughout the first two

quarters of 2007. Under either alternative, the Phase I evidentiary hearing and briefing schedule should be postponed and combined with the evidentiary hearing and briefing schedule for Phase II. The August 3, 2007 date for publication of the draft EIS/EIR can be preserved, along with the public participation and comment process. Under the first alternative, SDG&E and initial CAISO testimony would be filed on January 26, 2007 and DRA, intervenor and rebuttal testimony filed in accordance with the current schedule. Another round of testimony, in the July-August time frame (or later), would be triggered by the supplemental CAISO testimony. Given this proposed testimony filing schedule, the Aspen consultants can receive the results of the CAISO studies well before the August 3, 2007 draft publication date. Once the EIS/EIR is published, parties can file supplemental testimony addressing additional issues on the time schedule originally set forth. The evidentiary hearing can begin on October 8, 2007 for all Phase I and II issues.

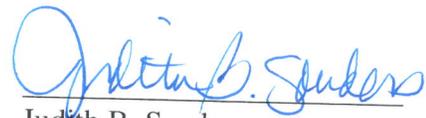
Alternatively, SDG&E and initial CAISO testimony could be filed on January 26, 2007 but DRA and intervenor testimony not submitted until after the CAISO filed its supplemental testimony and study results. The evidentiary hearing and briefing schedule would still be combined for Phases I and II. Under either alternative, the January 2008 date for a final decision can be preserved, and obviously there are numerous other schedule permutations that can still accommodate the date for completion of the case.

III. CONCLUSION

The CAISO is well aware that this proceeding plays an important role with respect achieving the state's renewable energy targets, and that any delays in the schedule could negatively affect SDG&E's ability to reach such targets. The CAISO further supports the Commission's goal of creating a full and complete record in this

proceeding regarding the economic and reliability implications of the alternatives proposed by the parties and the Commission's consultant. Unfortunately, this process will be more time consuming than originally anticipated when the November 1, 2006 Scoping Ruling was issued. Thus, the CAISO has attempted to balance these interests by proposing a modified procedural schedule that will accomplish the Commission's goals and still preserve the completion date for the proceeding. The CAISO's proposal is reasonable and should be approved.

Respectfully submitted,



Judith B. Sanders
151 Blue Ravine Road
Folsom, CA 95630
Telephone: (916) 351-4400
Facsimile: (916) 608-7222

**ATTORNEYS FOR THE
CALIFORNIA
INDEPENDENT SYSTEM
OPERATOR**

Sunrise Transmission Alternatives

Docket Numbers A. 06-08-010 and A. 05-12-014

Attachment to Motion for Extension of Time to Complete Studies

Filed by the California Independent System Operator

On January 8, 2007

SUMMARY OF ALTERNATIVES

	TRANSMISSION ALTERNATIVE PROPONENTS	NUMBER OF ALTERNATIVES	
		RELIABILITY	ECONOMIC
1	UCAN	<u>35</u>	<u>35</u>
2	LS POWER	<u>2</u>	<u>11</u>
3	RANCHO PENASQUITOS CONCERNED CITIZENS (RPCC)	<u>3</u>	<u>3</u>
4	MUSSEY GRADE ROAD ALLIANCE	<u>1</u>	<u>1</u>
5	CPUC CEQA TEAM (ASPEN)	<u>3</u>	<u>3</u>
6	TNHC	<u>2</u>	<u>2</u>
	<i>TOTAL</i>	46	55

UCAN's TRANSMISSION ALTERNATIVES

Item #	Description of Alternative	RELIABILITY CASES		ECONOMIC CASES	
		2010	2015	2010	2015
0	<p>Starting Base Case (Common for All Other Scenarios):</p> <p>1) CA solar rooftop initiative (150 MW for SDG&E)</p> <p>2) Model SDG&E area renewables & D.G. (per UCAN's load spreadsheet)</p> <p>3) Demand reduction</p> <p>4) Upgrade Path 42 (IID-SCE) from 600 MW to 1500 MW (2010)</p> <p>5) 5x48 MW CT's in San Diego (2008)</p> <p>6) Use load forecast per UCAN's load spreadsheet (based on SDG&E's LTPP filing)</p> <p>7) Check non-CAISO load forecast (for Gridview runs only)</p> <p>8) Modify non-CAISO generation per UCAN Data Request 8-1d (for Gridview runs)</p> <p>9) Update PVD2 Plan of Service</p> <p>10) Monitor and use 1900 MW for North of Miguel limit</p> <p>11) South of SONGS path rating (2200 MW normal / 2500 MW emergency)</p> <p>12) Remove 500kV lines in AZ/Mexico in Gridview case per UCAN data request 8-1d</p> <p>13) Verify Pmax for CT's in San Diego Basin (per SDG&E's 12/11/06 LTPP, Exhibit IV-10)</p> <p>14) Add Encina-Penasquitos 230kV # 2 line, per SDG&E's 12/11/06 LTPP, Exhibit IV-10</p>	1	1	1	1

UCAN's TRANSMISSION ALTERNATIVES

Item #	Description of Alternative	RELIABILITY CASES		ECONOMIC CASES	
		2010	2015	2010	2015
	<u>A. Base Case Above + Scenarios</u>				
1	Case 0 + Sun Path Project (2010)	1	0	1	0
2	Case 0 + Mexico Light 140 MW (2010)	0	0	0	0
3	Case 2 + LADWP's Green Path North (2011)	0	1	0	1
4	Case 0 + Mexico Light 140 MW (2010) + 2x48 MW CT's (2011) + 1x48 MW CT each year (2012-2016) + LADWP's GPN (2011) = Same As Case 3 Above for 2015	0	0	0	0
5	Case 0 + Mexico Light 300 MW (2010 - 2013) + Sun Path (2014) = Same as Case 2 in 2010 only	0	1	0	1
6	Case 0 + Path 44 (S/O SONGS) Upgrade (2010) + Sun Path (2014)	1	1	1	1
7	Case 0 + 500/230kV Substation at San Felipe instead of Central = Same as Case 1 (Cost Issue Only)	0	0	0	0
	<u>B. Base Case + 240 MW CT's in San Diego + Scenarios</u>				
8	Case 0 + 240 MW CT's + Sun Path (2010)	1	0	1	0
9	Case 0 + 240 MW CT's + Mexico Light 140 MW (2011)	0	1	0	1
10	Case 0 + 240 MW CT's + Mexico Light 140 MW (2011) + LADWP's GPN (2011)	0	1	0	1
11	Case 0 + 240 MW CT's + Sun Path (2013)	0	1	0	1
12	Case 0 + 240 MW CT's + Path 44 200 MW Upgrade (2011)	0	1	0	1
13	Case 0 + 240 MW CT's + 500/230kV San Felipe Substation instead of Central = Same as Item # 8 (Cost Issue Only)	0	0	0	0

UCAN's TRANSMISSION ALTERNATIVES

Item #	Description of Alternative	RELIABILITY CASES		ECONOMIC CASES	
		2010	2015	2010	2015
	C. Base Case + LADWP GPN + Scenarios				
14	Case 0 + LADWP GPN + Sun Path (2010)	1	0	1	0
15	Case 0 + LADWP GPN + Mexico Light 140 MW (2010) + Path 44 Upgrade 300 MW (2011)	1	1	1	1
16	Case 0 + LADWP GPN + Mexico Light 140 MW (2010) + 2x48 MW CT's (2011) + 1x48 MW (2012-2016)	0	1	0	1
17	Case 0 + LADWP GPN + Mexico Light 300 MW (2010-2013) + Sun Path (2014)	1	1	1	1
18	Case 0 + LADWP GPN + Path 44 Upgrade 300 MW (2010) + Sun Path (2014)	1	1	1	1
19	Case 0 + LADWP GPN + Sun Path with 500/230kV San Felipe Substation instead of Central Substation = Same as Item # 14 (Cost Issue Only)	0	0	0	0

UCAN's TRANSMISSION ALTERNATIVES

Item #	Description of Alternative	RELIABILITY CASES		ECONOMIC CASES	
		2010	2015	2010	2015
	<u>D. Base Case + South Bay Repower + Scenarios</u>				
20	Case 0 + 620 MW South Bay Repower + Sun Path Project (2010)	1	0	1	0
21	Case 0 + South Bay Repower (2010)	1	0	1	0
22	Case 0 + South Bay Repower (2010) + LADWP GPN (2011)	0	1	0	1
23	Case 0 + South Bay Repower (2010) + Sun Path (2015)	0	1	0	1
24	Case 0 + South Bay Repower (2010) + Sun Path (2010) with 500/230kV San Felipe Substation instead of Central = Same as Item # 20 (Cost Issue Only)	0	0	0	0
	<u>E. Base Case + AMI (Advanced Metering Initiative - UCAN DR 7-149) + Scenarios</u>				
25	Case 0 + AMI + Sun Path (2010)	1	0	1	0
26	Case 0 + AMI + Mexico Light 140 MW (2010-11), Mexico Light 300 MW (2012+)	1	1	1	1
27	Case 0 + AMI + Path 44 Upgrade 300 MW (2010) + LADWP GPN (2011)	1	1	1	1
28	Case 0 + AMI + Mexico Light 140 MW (2010-11), Mexico Light 300 MW (2012-14), remove and replace these with Sun Path in 2015	0	1	0	1
29	Case 0 + AMI + Sun Path (2010) with San Felipe 500/230kV Substation instead of Central = Item # 25 (Cost Issue Only)	0	0	0	0

UCAN's TRANSMISSION ALTERNATIVES

Item #	Description of Alternative	RELIABILITY CASES		ECONOMIC CASES	
		2010	2015	2010	2015
	<u>F. Base Case + Actions by Others (240 MW CT's in 2008 + LADWP GPN + South Bay Repower + AMI) + Scenarios</u>				
30	Case 0 + Action by Others + Sun Path (2010)	1	0	1	0
31	Case 0 + Action by Others + Sun Path (2015)	0	1	0	1
32	Case 0 + Action by Others	1	0	1	0
33	Case 0 + Action by Others + Sun Path (2010) with 500/230kV substation at San Felipe instead of Central = Same as Item # 30 (Cost Issue Only)	0	0	0	0
	<u>G. Base Case + 500 MW Eastern San Diego wind (SDG&E's 12/05 Sunrise application) via 500/230kV substation connected to SWPL</u>				
34	Case 0 + 500MW Eastern S/D wind + Sun Path Project (2010)	1	0	1	0
35	Case 0 + 500 MW Eastern S/D wind + 2x230kV lines from Boulevard Substation to Los Coches/Sycamore Canyon	1	0	1	0
	SUB-TOTAL	17	18	17	18
	TOTAL	35		35	

LS POWER's ALTERNATIVES

Alternative #	Description of Alternative	RELIABILITY	ECONOMIC
1	Economic study scenario 1 (2010) - see LS Power's document for more details (this assumes LS Power 620 MW re-power is in the base case)	0	1
2	Economic study scenario 1 + Sunrise/Green Path (2010)	0	1
3	Economic study scenario 2 + Sun Path - LS Power 620 MW re-power + 620 MW Palo Verde generation (2010)	0	1
4	Economic study scenario 1 + 600 MW solar generation each for SCE and SDG&E (2010)	0	1
5	Scenario 4 + Sun Path (2010)	0	1
6	Scenario 1 + transmission upgrades from IVSG (2010)	0	1
7	Scenario 6 + 600 MW solar generation each for SCE and SDG&E (2010)	0	1
8	Reliability study without Sun Path Project + LS Power SB Re-power 620 MW + as needed in-basin generation for mitigating reliability concerns (2010)	1	0
9	Reliability study without Sun Path Project + LS Power SB Re-power 620 MW + as needed in-basin generation for mitigating reliability concerns (2015)	1	0
10	Economic study scenario 1 (2015) - see LS Power's document for more details (this assumes LS Power 620 MW re-power is in the base case)	0	1
11	Economic scenario 2: Scenario 1 (2015) + Sun Path	0	1
12	Economic scenario 3 (2015): Scenario 2 (2015) - LS Power Re-power (620 MW) + 620 MW Palo Verde plant	0	1
13	Economic scenario 4: Scenario 1 (2015) + transmission upgrades from IVSG	0	1
TOTAL		2	11

RANCHO PENASQUITOS CONCERNED CITIZENS' ALTERNATIVES

Alternative #	Description of Alternative	RELIABILITY	ECONOMIC
1	Place series reactors in series with O/L Sycamore Canyon transformers	1	1
2	Add one 230/138kV and 230/69kV transformers at Sycamore Canyon and one 230/69kV transformer at Miguel Substation	1	1
3	Loop in Mission-Miguel 230kV lines into Sycamore Canyon Sub., and add one 230/69kV transformer at Miguel Sub.	1	1
TOTAL		3	3

MUSSEY GRADE ROAD ALLIANCE'S TRANSMISSION ALTERNATIVES

Alternative #	Description of Alternative	RELIABILITY	ECONOMIC
1	Model LADWP's GPN	1	1
	TOTAL	1	1

CEQA TEAM (ASPEN)

Alternative #	Description of Alternative	RELIABILITY	ECONOMIC
1	LEAPS + System voltage support in SDG&E and SCE areas	1	1
2	LEAPS + SONGS Heavy (if necessary)	1	1
3	Valley - Central 500kV + Sun Path's 230kV facility addition (Central to Penasquitos upgrades)	1	1
	TOTAL	3	3

THE NEVADA HYDRO COMPANY (TNHC)

Alternative #	Description of Alternative	RELIABILITY	ECONOMIC
1	LEAPS PROJECT (2010)	1	1
2	LEAPS PROJECT (2015)	1	1
	TOTAL	2	2

January 9, 2007

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket No's. A.06-08-010 and A.05-12-014 - In the Matter of the Application of San Diego Gas & Electric Company (U-902) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project

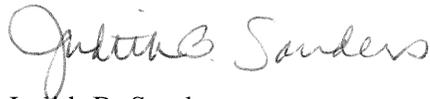
Dear Clerk:

Yesterday the California Independent System Operator Corporation filed a Motion For Extension Of Time To Complete Studies in the above-referenced dockets. The Motion refers to an attachment that was inadvertently omitted from the document. I have enclosed an original and five copies of the attachment, and I apologize for any inconvenience this oversight might have caused.

Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

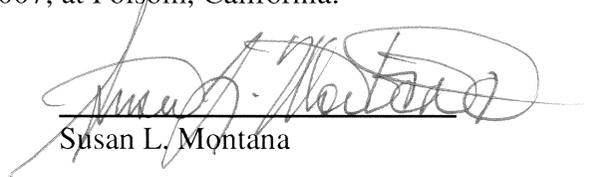


Judith B. Sanders
Attorney for
California Independent System Operator

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, an attachment to a Motion Of The California Independent System Operator Corporation For Extension Of Time To Complete Studies in Docket Nos. A.06-08-010 and A. 05-12-014.

Executed on January 9, 2007, at Folsom, California.



Susan L. Montana



California Independent
System Operator Corporation

January 8, 2007

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket No. A.06-08-010 - In the Matter of the Application of San Diego Gas & Electric Company (U-902) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project

Dear Clerk:

Enclosed for filing please find an original and five copies of a Motion Of The California Independent System Operator Corporation For Extension Of Time To Complete Studies in the above-referenced dockets.

Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

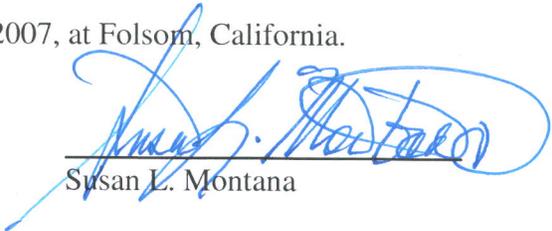
Sincerely,

Judith B. Sanders
Attorney for
California Independent System Operator

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, a Motion Of The California Independent System Operator Corporation For Extension Of Time To Complete Studies in Docket Nos. A.06-08-010 and A. 05-12-014.

Executed on January 8, 2007, at Folsom, California.



Susan L. Montana

ABBAS M. ABED NAVIGANT CONSULTING, INC. aabed@navigantconsulting.com	ANDREW B. BROWN ELLISON, SCHNEIDER & HARRIS, LLP abb@eslawfirm.com	AUDRA HARTMANN LS POWER GENERATION ahartmann@lspower.com	G. ALAN CONNES CABRILLO POWER I LLC alan.connes@nrgenergy.com
PATRICIA C. SCHNIER barbschnier@yahoo.com	Billie C. Blanchard CALIF PUBLIC UTILITIES COMMISSION bcb@cpuc.ca.gov	BRIAN T. CRAGG GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP bcragg@gmsrr.com	BRADLY S. TORGAN CALIFORNIA DEPT. OF PARKS & RECREATION btorgan@parks.ca.gov
CARRIE DOWNEY HORTON KNOX CARTER & FOOTE cadowney@san.rr.com	CAROLYN A. DORROH RAMONA COMMUNITY PLANNING GROUP carolyn.dorroh@cubic.com	CASE ADMINISTRATION SOUTHERN CALIFORNIA EDISON COMPANY case.admin@sce.com	LAUREL GRANQUIST celloinpin@sbcglobal.net
CALIFORNIA ENERGY MARKETS cem@newsdata.com	CENTRAL FILES SAN DIEGO GAS & ELECTRIC centralfiles@semprautilities.com	STEVE/CAROLYN ESPOSITO cesposit@sdcoe.k12.ca.us	CLAY E. FABER SOUTHERN CALIFORNIA GAS COMPANY cfaber@semprautilities.com
CLARE LAUFENBERG CALIFORNIA ENERGY COMMISSION Claufenb@energy.state.ca.us	BRIAN KRAMER colobiker@gmail.com	CONNIE BULL conniebull@cox.net	PAUL RIDGWAY cpuc@92036.com
CRAIG ROSE THE SAN DIEGO UNION TRIBUNE craig.rose@uniontrib.com	CAROLYN MORROW GOLIGHTLY FARMS Csmmarket@aol.com	DAHVIA LOCKE COUNTY OF SAN DIEGO Dahvia.Locke@sdcounty.ca.gov	DARELL HOLMES SOUTHERN CALIFORNIA EDISON darell.holmes@sce.com
DAVID LLOYD CABRILLO POWER I, LLC david.lloyd@nrgenergy.com	DAVID BRANCHCOMB BRANCHCOMB ASSOCIATES, LLC david@branchcomb.com	DAVE DOWNEY NORTH COUNTY TIMES ddowney@nctimes.com	DENIS TRAFECANTY COMMUNITY OF SANTA YSABEL & RELATED COMM denis@vitalityweb.com
David Ng CALIF PUBLIC UTILITIES COMMISSION dhn@cpuc.ca.gov	DAVID HOGAN CENTER FOR BIOLOGICAL DIVERSITY dhogan@biologicaldiversity.org	DIANE I. FELLMAN FPL ENERGY, LLC diane_fellman@fpl.com	DIANE CONKLIN djconklin@earthlink.net
DIANE J. CONKLIN MUSSEY GRADE ROAD ALLIANCE djconklin@earthlink.net	DAVID KATES DAVID MARK AND COMPANY dkates@sonic.net	DIANA LINSDAY ANZA-BORREGO FOUNDATION & INSTITUTE dlindsay@sunbeltpub.com	DAVID T. KRASKA PACIFIC GAS AND ELECTRIC COMPANY dtk5@pge.com
DON WOOD SR. PACIFIC ENERGY POLICY CENTER dwood8@cox.net	BOB & MARGARET BARELMANN ecp@ixpres.com	J.A. SAVAGE CALIFORNIA ENERGY CIRCUIT editorial@californiaenergycircuit.net	ELIZABETH EDWARDS RAMONA VALLEY VINEYARD ASSOCIATION edwrdsgrfx@aol.com
LEGAL & REGULATORY DEPARTMENT CALIFORNIA ISO e-recipient@caiso.com	FREDERICK M. ORTLIEB CITY OF SAN DIEGO fortlieb@sandiego.gov	E. GREGORY BARNES SAN DIEGO GAS & ELECTRIC COMPANY gbarnes@sempra.com	GLENN E. DROWN gedrown@mindspring.com
EDWARD GORHAM WESTERNERS INCENSED BY WRECKLESS ELECTRI gorhamedward@cox.net	GREG SCHUETT gregschuett@mac.com	MARY ALDERN COMMUNITY ALLIANCE FOR SENSIBLE ENERGY hikermomma1@yahoo.com	HARVEY PAYNE RANCHO PENASQUITOS CONCERNED CITIZENS hpayne@sdgllp.com
DEMIAN DORRANCE inbox858-cvcc@yahoo.com	IRENE STILLINGS SAN DIEGO REGIONAL ENERGY Irene.stillings@sdenergy.org	JAMES H. CALDWELL JR. PPM ENERGY, INC. james.caldwell@ppmenergy.com	JUSTIN AUGUSTINE THE CENTER FOR BIOLOGICAL DIVERSITY jaugustine@biologicaldiversity.org
JASON YAN PACIFIC GAS AND ELECTRIC COMPANY jay2@pge.com	JENNIFER PORTER SAN DIEGO REGIONAL ENERGY OFFICE jennifer.porter@sdenergy.org	JUDY GRAU CALIFORNIA ENERGY COMMISSION jgrau@energy.state.ca.us	HEIDI FARKASH JOHN & HEIDI FARKASH TRUST jhfar@pacbell.net
JIM BELL jimbellelsi@cox.net	JEDEDIAH J. GIBSON ELLISON, SCHNEIDER & HARRIS LLP jig@eslawfirm.com	JOHN W. LESLIE LUCE, FORWARD, HAMILTON & SCRIPPS, LLP jleslie@luce.com	JOSEPH RAUH RANCHITA REALTY joe@ranchitarealty.com
JUDITH B. SANDERS CALIFORNIA INDEPENDENT SYSTEM OPERATOR jsanders@caiso.com	JUILE B. GREENISEN LATHAM & WATKINS LLP juile.greenisen@lw.com	KELLY FULLER k.d.fuller@sbcglobal.net	KARL HIGGINS HIGGINS & ASSOCIATES karlhiggins@adelphia.net
KEVIN WOODRUFF WOODRUFF EXPERT SERVICES, INC. kdw@woodruff-expert-services.com	GLENDIA KIMMERLY kimmerlys@yahoo.com	KAREN NORENE MILLS CALIFORNIA FARM BUREAU FEDERATION kmills@ctbf.com	KEVIN O'BEIRNE SAN DIEGO GAS & ELECTRIC COMPANY ko'beirne@semprautilities.com
KEITH RITCHEY kritchey@san.rr.com	Keith D White CALIF PUBLIC UTILITIES COMMISSION kwh@cpuc.ca.gov	DONALD C. LIDDELL DOUGLASS & LIDDELL liddell@energyattorney.com	MAUREEN ROBERTSON RAMONA SENTINEL maureen@ramonasentinel.com
MICHAEL P. CALABRESE CITY ATTORNEY'S OFFICE mcalabrese@sandiego.gov	MICHEL PETER FLORIO THE UTILITY REFORM NETWORK (TURN) mflorio@turn.org	MICHAEL J. GERGEN LATHAM & WATKINS LLP michael.gergen@lw.com	MATTHEW JUMPER SAN DIEGO INTERFAITH HOUSING FOUNDATION mjumper@sdihf.org
MARY KAY FERWALT mkferwall@yahoo.com	MARC PRYOR CALIFORNIA ENERGY COMMISSION mpryor@energy.state.ca.us	MRW & ASSOCIATES, INC. mrw@mrwassoc.com	Marcus Nixon CALIF PUBLIC UTILITIES COMMISSION mrxc@cpuc.ca.gov
MICHAEL SHAMES UTILITY CONSUMERS' ACTION NETWORK mshames@ucan.org	MICHAEL S. PORTER PACIFIC GAS AND ELECTRIC COMPANY mspe@pge.com	MICHAEL L. WELLS CALIFORNIA DEPARTMENT OF PARKS&RECREATION mwells@parks.ca.gov	Nicholas Sher CALIF PUBLIC UTILITIES COMMISSION nms@cpuc.ca.gov

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
norman.furuta@navy.mil

NANCY PARINELLO
nparinello@gmail.com

MICHAEL PAGE
oakhollowranch@wildblue.net

PETER SCHULTZ
OLD JULIAN CO.
oldjuliano@integrity.com

PAT/ALBERT BIANEZ
patricia_fallon@sbcglobal.net

DAN PERKINS
ENERGY SMART HOMES
perkydan@yahoo.com

PAUL G. SCHEUERMAN
SHEUERMAN CONSULTING
PGS@IEEE.org

CHRISTOPHER P. JEFFERS
polo-player@cox.net

PAM WHALEN
pwhalen2@cox.net

Robert Elliott
CALIF PUBLIC UTILITIES COMMISSION
rae@cpuc.ca.gov

RORY COX
rcox@pacificenvironment.org

AARON QUINTANAR
RATE PAYERS FOR AFFORDABLE CLEAN
ENERGY
rcox@pacificenvironment.org

REBECCA PEARL
ENVIRONMENTAL HEALTH COALITION
rebeccap@environmentalhealth.org

RICHARD W. RAUSHENBUSH
LATHAM & WATKINS LLP
richard.raushenbush@lw.com

RICHARD LAUCKHART
GLOBAL ENERGY
rtauckhart@globalenergy.com

Regina DeAngelis
CALIF PUBLIC UTILITIES COMMISSION
rmd@cpuc.ca.gov

EILEEN BIRD
sanrocky@aol.com

SARA FELDMAN
CA STATE PARKS FOUNDATION
sara@calparks.org

Steven A. Weissman
CALIF PUBLIC UTILITIES COMMISSION
saw@cpuc.ca.gov

SCOT MARTIN
scotmartin478@msn.com

SCOTT J. ANDERS
UNIVERSITY OF SAN DIEGO - LAW
scottanders@sandiego.edu

PAUL BLACKBURN
SIERRA CLUB, SAN DIEGO CHAPTER
sdenergy@sierraclubsandiego.org

SEPHRA A. NINOW
SAN DIEGO REGIONAL ENERGY OFFICE
sephra.Ninow@sdenergy.org

SUSAN FREEDMAN
SAN DIEGO ASSOCIATION OF GOVERNMENTS
sfr@sandag.org

Scott Logan
CALIF PUBLIC UTILITIES COMMISSION
sjl@cpuc.ca.gov

JOHN RAIFSNIDER
skyword@sbcglobal.net

SUSAN LEE
ASPEN ENVIRONMENTAL GROUP
slee@aspeneg.com

LARA LOPEZ
soliviasmom@cox.net

TOM BLAIR
CITY OF SAN DIEGO
TBlair@sandiego.gov

Traci Bone
CALIF PUBLIC UTILITIES COMMISSION
tbo@cpuc.ca.gov

Terrie D. Prosper
CALIF PUBLIC UTILITIES COMMISSION
tdp@cpuc.ca.gov

TOM GORTON
BORREGO SUN
tgorton@cableusa.com

THOMAS A. BURHENN
SOUTHERN CALIFORNIA EDISON
thomas.burhenn@sce.com

THOMAS ZALE
BUREAU OF LAND MANAGEMENT
Thomas_Zale@blm.gov

TOM MURPHY
ASPEN ENVIRONMENTAL GROUP
tmurphy@aspeneg.com

Thomas Flynn
CALIF PUBLIC UTILITIES COMMISSION
trf@cpuc.ca.gov

EPIC INTERN
EPIC/USD SCHOOL OF LAW
usdepic@gmail.com

MARTHA BAKER
VOLCAN MOUNTAIN PRESERVE FOUNDATION
vmp@sbcglobal.net

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
wblattner@semprautilities.com

WILLIE M. GATERS
williegaters@earthlink.net

OSA L. WOLFF
SHUTE, MIHALY & WEINBERGER, LLC
wolff@smwlaw.com

SHERIDAN PAUKER
SHUTE, MIHALY & WEINBERGER LLP
wolff@smwlaw.com

PHILLIP & ELIANE BREEDLOVE
wolfmates@cox.net

Scott Cauchois
CALIF PUBLIC UTILITIES COMMISSION
wsc@cpuc.ca.gov

SCOTT KARDEL
PALOMAR OBSERVATORY
WSK@astro.caltech.edu

JOETTA MIHALOVICH
11705 ALDERCREST POINT
SAN DIEGO, CA 92131

WALLY BESUDEN
SPANGLER PEAK RANCH, INC
PO BOX 1959
ESCONDIDO, CA 92033

WILLIAM TULLOCH
28223 HIGHWAY 78
RAMONA, CA 92065

LYNDA KASTOLL
BUREAU OF LAND MANAGEMENT
1661 SOUTH 4TH STREET
EL CENTRO, CA 92243