

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

Order Instituting Rulemaking to
Update and Amend Commission
General Order 131-D.

Rulemaking 23-05-018
(Filed May 18, 2023)

**REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON THE ORDER INSTITUTING RULEMAKING TO UPDATE AND
AMEND COMMISSION GENERAL ORDER 131-D**

Roger E. Collanton
General Counsel
Anthony Ivancovich
Deputy General Counsel
Sarah E. Kozal
Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel.: (916) 956-8838
Fax: (916) 608-7222
skozal@caiso.com

Attorneys for the California Independent
System Operator Corporation

Dated: July 7, 2023

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

Order Instituting Rulemaking to
Update and Amend Commission
General Order 131-D.

Rulemaking 23-05-018
(Filed May 18, 2023)

**REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON THE ORDER INSTITUTING RULEMAKING TO UPDATE AND
AMEND COMMISSION GENERAL ORDER 131-D**

I. Introduction

The California Independent System Operator Corporation (CAISO) submits these reply comments on the *Order Instituting Rulemaking to Update and Amend Commission General Order 131-D* (OIR). The CAISO emphasizes that the Commission should focus on reforms to streamline permitting processes as suggested by other parties in opening comments.

II. Comments

The CAISO develops a transmission plan through an extensive process that utilizes resource portfolios from the Commission’s Integrated Resource Plan (IRP) proceeding. The CAISO implemented its transmission planning process after the Commission last amended General Order 131-D, and thus the General Order does not reflect the CAISO’s current transmission planning process, which is highly integrated with the Commission’s resource planning. General Order 131-D should evolve to facilitate the state’s projected rapid generation and transmission growth needed to meet state clean energy goals.

Many parties submitted opening comments that echo these observations. The CAISO agrees with parties that recommend the Commission use this opportunity to streamline the permitting processes set forth in General Order 131-D.¹ San Diego Gas & Electric (SDG&E) suggests that the Commission refrain from imposing additional permitting requirements except where “truly constructive.”² The CAISO agrees with SDG&E that some of the proposed

¹ PG&E Opening Comments, pp. 2-3, SCE Opening Comments, pp. 1-2, SDG&E Opening Comments, p. 1.

² SDG&E Opening Comments, p. 3.

changes to General Order 131-D could create administrative burdens and unnecessary redundancy in permitting processes. The CAISO agrees with SDG&E that given the need to accelerate transmission project development to meet state policy goals, the Commission should focus on reforms that will help expedite permitting processes rather than adding additional requirements to existing processes.

Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) similarly agree with the goals of streamlining permitting processes and like SDG&E, note that the some of the proposed edits to General Order 131 run contrary to the Commission's self-proclaimed goal to provide more efficient and consistent processes.³ The CAISO agrees with these parties that the Commission should prioritize changes to General Order 131-D that will more effectively streamline permitting processes and focus on removing barriers to accelerate the development of energy projects that are critical to achieving state clean energy goals.

III. Conclusion

The CAISO appreciates the opportunity to submit these reply comments and looks forward to continued engagement in this rulemaking to identify opportunities to streamline the Commission's permitting processes.

Respectfully submitted,

By: /s/ Sarah Kozal

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Sarah E. Kozal

Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel.: (916) 956-8838

Fax: (916) 608-7222

skozal@caiso.com

Date: July 7, 2023

³ SCE Opening Comments, p. 5