



California Independent  
System Operator Corporation

May 2, 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 - 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 ALJ Weissman granted the California Independent System Operator Corporation's (CAISO's) request to file a Reply to the Response of UCAN to the CAISO's Motion for Extension of Time to Conduct Additional Studies on May 1, 2007. Unfortunately, due to technical computer problems, the CAISO was unable to serve and file the Reply on May 1. ALJ Weissman subsequently agreed that the Reply would be accepted as timely filed if filed and served today, May 2, 2007. Therefore, attached please find the CAISO Reply to the UCAN Response.

Thank you for your attention to this matter.

Sincerely,

/s/Judith B. Sanders

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Attorney for  
California Independent System Operator

**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)

**REPLY OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR TO THE RESPONSE OF UCAN  
TO THE APRIL 24, 2007 RULING ON MOTION  
FOR EXTENSION OF TIME**

Pursuant to Rule 11.1(f) of the Rules of Practice and Procedure, the California Independent System Operator (CAISO) hereby seeks leave to file this brief reply to the Response filed by UCAN to the April 24, 2007 ACR/ALJ Ruling on the CAISO Motion for extension of time to complete studies and for a revision of the procedural schedule. Such response is reasonable due to the inaccurate and inconsistent statements contained in UCAN's response.

**I. The Purpose of the CAISO's Alternative Scenario Studies is to Present  
Testimony to the Commission.**

It is important to remember that the November 1, 2006, Scoping Ruling originally directed the CAISO to study the UCAN alternatives contained in its prehearing statement, and to include the results in the CAISO's testimony. Specifically, that Ruling directed the CAISO to "submit testimony to address the concerns set forth above regarding its evaluation of the proposed project, including: 1) Information supplementing its evaluation of the proposed project with a more complete evaluation of the wires and non-wires alternatives (including the evaluation of UCAN's proposed alternatives)...3)

An assessment of how these additional factors impact the CAISO's assessment of the costs and benefits of the proposed project based on TEAM ” (Ruling, 11-12). Contrary to UCAN's apparent belief, this whole process has not been an exercise of providing discovery to UCAN for the purpose of preparing *UCAN* testimony. Rather, the Commission clearly intended that the UCAN alternatives would help frame the issues to be addressed in CAISO testimony as part of the *CAISO's* evaluation of the project. Thus, no purpose is accomplished in simply studying the UCAN alternatives if the CAISO does not present the results, and sponsor them, in *its* testimony. To the extent that UCAN does not agree with the CAISO testimony, or believes that the CAISO evaluation (as explained in the testimony) to be incorrect or “fouled up”, etc., such evidence will go to the weight of the testimony and not serve to exclude it the first instance.<sup>1</sup>

If the CAISO is going to evaluate the follow up runs requested by UCAN, then the results of those runs must be presented to the Commission in CAISO testimony. The Commission should not support UCAN's assertions that this packaging is unnecessary. If the CAISO is not going to submit testimony on May 14 presenting the results of the UCAN follow-up studies in the standard format, then the CAISO will assume that UCAN is no longer interested in having the CAISO evaluate the follow-up scenarios identified through discussions with UCAN and MRW, as outlined in the CAISO's April 20 Motion.

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<sup>1</sup> As an aside, the CAISO simply must respond to the UCAN assertion that the CAISO incorrectly “packaged” its results in the April 20 testimony (UCAN Response, 1). It seems that UCAN has overlooked the CAISO statement on page 31 that the UCAN2 scenario failed the CAISO reliability tests. Because no economic analysis was done for that scenario, the “numbers” for the base case and UCAN2 were the same, as shown on page 32. The statement on page 32 “ The economic analysis results set forth below have not accounted for these reliability violations.” is misleading. It does not apply to its reliability analysis and refers to the fact that the CAISO has not accounted for reliability criteria violations caused by excessive amounts of renewable generation in the IID area in the UCAN base case.

## **II. The Testimony and Rebuttal Testimony Set Forth in the April 24 Ruling is Reasonable.**

Based on the representation that the UCAN follow-up results need not be packaged in the CAISO May 14 submission, UCAN next objects to the modest adjustment to the testimony filing contained in the April 24 ruling. However, UCAN's suggested modifications are unworkable and do not address the time constraints faced by the CAISO (and the other parties).

Glossing over the time that the CAISO must spend preparing the RPCC follow up alternatives (and, according to UCAN, the UCAN alternatives), UCAN asserts that the June 1 testimony filing date poses no problems and that all interveners should be held to that schedule. While somewhat confusing, UCAN then goes on to suggest that RPCC be given a two week extension, until June 15, to file its direct testimony, and that RPCC's rebuttal will be due on June 22.

Clearly UCAN's schedule is unworkable because rebuttal testimony would be filed at the same time that the RPCC testimony is due. According to UCAN's proposal, there would have to be an additional date established for rebuttal testimony responsive to RPCC's direct case. Counsel for UCAN also commented, during the May 1 discovery conference call, that the rebuttal testimony filing date would provide UCAN with an opportunity to respond to the CAISO May 14 submission. Of course, this would preclude the CAISO (or any other party) from responding to the UCAN "rebuttal" submission. It seems that the UCAN modification causes more problems than it solves.

**III. A Modification to the Hearing Schedule Could Accommodate UCAN's Concerns.**

The CAISO is sympathetic with UCAN's concerns that pushing this hearing back to July 16 could overlap with the SDG&E GRC proceeding at the end of July. However, the CAISO nonetheless would prefer some additional preparation time before the beginning of the hearing. As an accommodation, the CAISO suggests that the hearing begin on July 12, and that the hearings could begin earlier and end later to move the process along. It would seem that the hearing overlap issue could be addressed through witness and cross examination scheduling, while still providing the CAISO with some leeway with the schedule.

Respectfully submitted,

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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 Reply Of The California Independent System Operator To The Response Of UCAN To The April 24, 2007 Ruling On Motion For Extension Of Time to each party in Docket No. A.06-08-010.

Executed on May 2, 2007 at Folsom, California.

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