

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

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U338E) for a Certificate of Public Convenience and Necessity for the West of Devers Upgrade Project and for an Interim Decision Approving the Proposed Transaction between Southern California Edison and Morongo Transmission LLC.

Application 13-10-020  
Filed October 25, 2013

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

Pursuant to the Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits these comments in response the Proposed *Decision Granting Certificate of Public Convenience and Necessity for the West of Devers Upgrade Project and Related Matter* (Proposed Decision).

**I. Introduction**

The Proposed Decision properly grants Southern California Edison Company a certificate of public convenience and necessity (CPCN) to construct the West of Devers Upgrade Project. The Proposed Decision correctly finds that the West of Devers Upgrade Project is necessary to facilitate deliverability for renewable energy resources identified in the Commission’s renewable portfolios, in furtherance of California’s 33% RPS. The Proposed Decision also correctly notes that the Phased Build Alternative would be imprudent and infeasible as a matter of policy and economics. The CAISO fully supports the Proposed Decision, with only minor modifications as discussed below.

**II. Corrections**

Ordering paragraphs one and two appear to incorrectly refer to the “environmentally superior project” in place of the proposed West of Devers Upgrade Project, as modified by the Tower Relocation Alternative and the Iowa Street 66 kV Underground Alternative.<sup>1</sup> The reference to the “environmentally superior alternative” is not consistent with the remainder of the Proposed Decision. The CAISO recommends that the Commission modify the first two ordering

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<sup>1</sup> Proposed Decision, Ordering Paragraphs 1 & 2, p. 44.

paragraphs to clarify that the CPCN grants SCE's request to construct the proposed West of Devers Upgrade Project.

### **III. Conclusion**

With the minor clarification discussed above, the CAISO fully supports the Proposed Decision.

Respectfully submitted,

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