



April 28, 2017

Mr. Neil Millar
Executive Director
Infrastructure Development
California Independent System Operator
250 Outcropping Way, Folsom, CA 95630

RE: NRDC Support of the expedited approval of the Old-Town to Mission Flow Control project

NRDC comments in support of expediting the above project as part of our work to better utilize existing transmission assets and rights of ways in furtherance of renewable energy integration and climate mitigation. The technology to be deployed in this case has robust potential to redirect power flows to avoid congestion in the transmission system enabling more complete transmission usage in corridors in which new transmission constrained by development, geography or environmental conflicts. This can defer or avoid transmission development in such locations.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's air, water, lands and wildlife resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

We believe this project is a low-cost, innovative approach that reduces the potential for load-shedding in the City of San Diego. Our support for this project is driven by several reasons:

- This is a short-term problem that needs a short-term solution. Smart Wires flow control devices are redeployable, meaning that they can be moved after the short-term need has ended.
- The proposed technology can meet the crucial in-service date and provides enhanced system flexibility.
- The experience gained from this project will be valuable to all California utilities. We consider this deployment to have value not only as a mitigation in this individual case but as a demonstration of the ability of advanced power flow technologies to address difficult grid management issues across the entire state.

Thank you for considering these comments.

Sincerely,

Carl Zichella
Director of Western Transmission

NATURAL RESOURCES DEFENSE COUNCIL

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