

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

In the Matter of the Application of)	Application No. 06-08-010
San Diego Gas & Electric Company)	(Filed August 4, 2006)
(U-902) for a Certificate of Public)	
Convenience and Necessity for the)	Application No. 05-12-014
<u>Sunrise Powerlink Transmission Project</u>)	(Filed December 14, 2005)

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR REGARDING THE ALTERNATIVE
ROUTE PROPOSALS SUBMITTED BY SAN
DIEGO GAS & ELECTRIC COMPANY**

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Date: October 12, 2006

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On October 2, 2006, San Diego Gas & Electric Company (SDG&E) responded to Commissioner's Grueneich's request made at the September 13, 2006 prehearing conference that SDG&E assess alternative routes for the Sunrise Powerlink project that avoid erecting a transmission line through the Anza-Borrego Desert State Park. SDG&E's response evaluated and presented results for three alternative corridors (B, C and D study corridors), all of which would avoid the park.

The CAISO generally does not become involved in or comment on routing issues; however, one attribute common to each alternative corridor B through D has raised significant concerns with the CAISO regarding the reliability performance of these alternative transmission solutions. SDG&E's response noted that all three alternative routes, "[parallel] the existing SWPL 500 kV line for an extended distance." Based on this common attribute, the CAISO has concluded that all alternative routes are significantly inferior to the original route because of the potential for substantial interruption in firm load in order to meet mandatory reliability criteria.

The SWPL transmission line is located in an area with a demonstrated high risk of brush fires that could cause, and have caused, outages on the transmission line. In fact, the SWPL transmission line experienced 22 fire-related and 5 lightning-related outages since 1995, which translates to approximately 2.5 outages per year. If the new transmission line is located in the proximity of the SWPL transmission line, it would be subjected to approximately the same risk of fire and lightning outages as the existing line.

In light of the frequency of fire outages on the SWPL transmission line, it is possible, if not highly probable, that both SWPL and the alternative 500 kV transmission line could go out at the same time. Using a NERC Performance Category C contingency analysis, the loss of two 500 kV lines located in the same corridor would constitute a common mode failure that could trip firm load shedding in order to address the dual contingencies. In this case, a large amount of firm load, in the range of 900 – 1000 MW, would need to be interrupted to mitigate reliability concerns under a double-line outage of the SWPL and the new Sunrise Powerlink/Green Path transmission line. Although load shedding is permitted under the circumstances of a Category C common mode failure, this high amount of load drop is unacceptable to the CAISO because it would affect large numbers of customers, possibly in the range of 1 million households.

Furthermore, it is likely that the outage frequency on the SWPL transmission would cause the outage of the two 500 kV lines in the same corridor to be evaluated in accordance with NERC Performance Category B as a single element outage (N-1), rather than Performance Category C.¹ In contrast to the NERC Performance Category C dual element outage contingency described above, under NERC Performance Category B the

¹ According to the “WECC Disturbance-Performance Table,” the outage frequency associated with Category C is between 0.033 – 0.33 per year (or between 1-in-30 and 1-in-3 years).

interruption of firm load constitutes an unacceptable means of addressing the contingency. Accordingly, utilization of the alternative corridors, to the extent that they significantly parallel the existing SWPL 500 kV line for an extended distance would require other infrastructure upgrades to avoid load shedding and to satisfy reliability criteria at an unknown, but potentially large cost.

The CAISO appreciates the opportunity to present this assessment of the reliability concerns raised by the Sunrise Powerlink project alternative routes.

Date: October 12, 2006

Respectfully submitted,

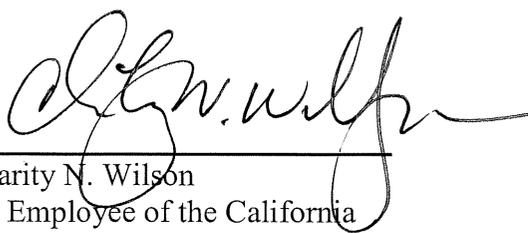
Grant Rosenblum
Judith B. Sanders

Attorneys for the California
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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 Comments of The California Independent System Operator on Regarding the Alternative Route Proposals Submitted by San Diego Gas and Electric Company to each party in Docket Nos. A.06-08-010 and A.05-12-014.

Executed on October 12, 2006 at Folsom, California.

A handwritten signature in black ink, appearing to read "Charity N. Wilson", written over a horizontal line.

Charity N. Wilson
An Employee of the California
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