

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

Order Instituting Rulemaking on Policies and Practices for the Commission's Transmission Assessment Process

R.04-01-026

**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE PROPOSED OPINION CLOSING PROCEEDING**

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June 20, 2005

**BEFORE THE
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OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking on Policies and Practices for the Commission's Transmission Assessment Process

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**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE PROPOSED OPINION CLOSING PROCEEDING**

Pursuant to the Rule 77.5 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation ("CAISO") respectfully submits its reply comments on Administrative Law Judge Vieth's draft Opinion Closing Proceeding ("Draft Opinion"). The CAISO's reply responds to comments submitted by Pacific Gas and Electric Company ("PG&E"), The Utility Reform Network ("TURN") and the Office of Ratepayer Advocates ("ORA").

I.

**PG&E'S PROPOSAL TO ADOPT RELIABILITY CRITERIA
CAN BE RECONCILED WITH THE CONCERNS IDENTIFIED IN PRESIDENT
PEEVEY'S ASSIGNED COMMISSIONER'S RULING ON NEXT STEPS**

PG&E recommends that the "Commission issue a decision that adopts the [CAISO]'s proposed reliability criteria" and amends General Order ("GO") 131-D in a manner that results in the Commission not revisiting an CAISO finding of need using that reliability criteria. (PG&E at pp. 1 and 2.) President Peevey's Assigned Commissioner's Ruling on Next Steps, issued on October 15, 2005 ("ACR"), suggested that adoption of PG&E's proposal is potentially

problematic. The ACR states the “marked disagreement” over the proposed amendment to GO 131-D “to require Commission deference to the CAISO’s determination ... for reliability reasons or for economic reasons ... raises the specter of time-consuming and costly litigation, rather than timely, thoughtful reform of current transmission review processes.” (ACR at pp. 1-2.) On further reflection of the issues raised in the Draft Opinion, the CAISO believes that PG&E’s proposed changes to GO 131-D can be reconciled with the concerns raised by the ACR and other parties, including TURN and ORA. The key is to clearly differentiate two uses of the term “need” in the Certificate of Public Convenience and Necessity (“CPCN”) context. In this regard, the reply comments of ORA are helpful in articulating a potential interim compromise solution.

ORA identifies four discrete tasks associated with evaluation of a transmission project on reliability grounds:

1. the choice of reliability criteria to apply [footnote omitted];
2. the identification of an engineering need to meet that reliability criteria at some time in the future;
3. engineering verification that one or more projects can meet the criteria; and
4. identification of the best project or program that would result in the transmission grid being in compliance with the reliability criteria while optimizing other goals of the Commission, but that the proposed transmission project or a generation project, load management program, or energy efficiency program.

ORA further acknowledges that intervenors and the Commission “have generally deferred to the CAISO’s expert opinion on tasks (1)-(3).” (ORA Reply Comments at 2.) It follows that the use of the term “need” in PG&E’s proposed changes to GO 131-D can be understood, without dispute and consistent with tasks (1)-(3), as referring to the CAISO’s identification of a future violation of agreed upon reliability criteria that can be resolved through the proposed transmission alternative(s) selected by the CAISO. This establishes both a “need” for a resource

solution at a particular time to avoid an anticipated reliability criteria violation and the fact that the transmission project constitutes a viable engineering solution to the need. What it does not establish is whether transmission upgrades constitute the optimal solution. The latter question can be viewed as “Need,” pursuant to Public Utilities Code section 1001. To reflect this dual use of “need,” PG&E’s proposed language may require an additional sentence clarifying that, “The Commission retains the authority to determine whether the reliability need established by the CAISO’s determination is best addressed through the proposed transmission project, or some other resource alternative, including, but not limited to, a generation project, demand response program, or energy efficiency program. In any event, the Commission shall ensure that the foregoing reliability need is addressed in a timely manner.”

The CAISO recognizes that, while this alternative will serve to streamline certain issues traditionally tested during a CPCN proceeding, it does not address rationalization of the “comprehensive resource planning framework” emphasized by the ACR. Simply put, how and when alternative resource solutions are considered remain open questions under the CAISO’s proposal. Absent answers to questions concerning the overall resource planning process, the Commission may believe that action on this OIR is premature. On the other hand, the Commission may also embrace this recommendation as a necessary first step that can serve as a platform to build from during the ongoing process referenced in the ACR, including the effort to integrate the Commission’s long-term planning process and the California Energy Commission’s Integrated Energy Policy Report process. (See, ACR at p. 2.)

II.

TURN’S CRITICISMS OF TEAM SHOULD BE IGNORED

TURN “questions” the Draft Opinion’s “apparent presumption” that TEAM merits special status as a potential methodology for assessing the economic value of transmission.

(TURN Comments at p. 1.) While the CAISO respects, but may not always agree with, the input of TURN on issues confronting this Commission, TURN's criticism of the Draft Opinion in this regard reflects a unfounded prejudice that imperils the current effort to rationalize the transmission siting process in California. Rather than granting "special status" as alleged by TURN, the Draft Opinion simply acknowledges the reality that the CAISO is empowered under federal law to evaluate the economics of transmission projects to determine whether the project costs should be borne by all users of the CAISO grid. It follows that efficiency and added regulatory transparency will result if all entities involved in the planning and siting process utilize the same economic assessment methodology. At this time, apart from TEAM, no party has offered, let alone developed, a comparable or comprehensive evaluation methodology. That said, the CAISO expects that any future evaluation of TEAM will invite suggestions to improve and refine the TEAM approach. The proposed modification to the Draft Opinion advocated by TURN, therefore, is unnecessary and can be misused to delay the laudable objectives underlying this proceeding.

TURN also states that reviewing TEAM through A.05-04-015 - Southern California Edison's application to construct Devers-Palo Verde #2 – is "premature" because "it is not clear that the ISO will submit in A.05-04-015 its own analysis of DPV2, which was purportedly prepared using the TEAM." (TURN Comments at p. 2.) The CAISO does intend to participate in A.05-04-015 by submitting its economic report upon which the CAISO Board of Governors approved the project. However, the CAISO is also concerned that the DPV2 proceeding not get "bogged down." The CAISO does believe that A.04-04-015 can be used efficiently to advance the evaluation of TEAM, but agrees that how this coordination is accomplished should be determined following a prehearing conference in either existing I.00-11-001 or a new proceeding

specifically opened for evaluating TEAM that includes assistance from the Commission and ALJ assigned to A.05-04-015.

III.

CONCLUSION

As noted in the CAISO's opening comments, the CAISO recognizes the Commission's procedural limitations may compel closure of the instant rulemaking proceeding. However, the Commission should consider the value of presently adopting the reliability criteria submitted by the CAISO and modifying GO 131-D to reflect this adoption, as suggested by PG&E and further elaborated by the CAISO. In addition, the Commission should explicitly commit fully evaluating the CAISO's TEAM approach.

Respectfully submitted,



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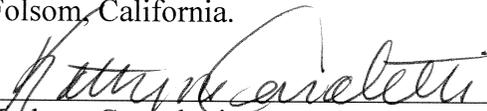
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Date: June 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have served, this day, a copy of the foregoing Reply Comments of the California Independent System Operator Corporation on the Proposed Opinion Closing Proceeding on the service list for **R.04-01-026** by electronic mail to each party.

Executed on June 20 2005, at Folsom, California.



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