

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

In the Matter of the of San Diego Gas and Electric Company for a Certificate of Public Convenience and Necessity Authorizing the Construction of the for the Otay Mesa Power Purchase Agreement Transmission Project	Application 04-03-008
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**REPLY BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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The California Independent System Operator Corporation (“CAISO”) respectfully submits this reply brief in the above-referenced proceeding regarding San Diego Gas & Electric Company’s (“SDG&E”) application for a Certificate of Public Convenience and Necessity (“CPCN”) to construct the Otay Mesa Power Purchase Agreement Transmission Project (“OMTP”). Only the Office of Ratepayer Advocates (“ORA”) offers any material reservations to the OMTP. Its reservations, however, largely rest on misconceptions or errors. The CAISO believes that when these misconceptions and errors are corrected, the foundation for ORA’s opposition can be rejected and SDG&E’s application for a CPCN granted with respect to project need.

I. SCOPE OF THE PROCEEDING – ORA’S CLAIM THAT D.04-06-011 DID NOT NARROW THE SCOPE OF THIS PROCEEDING IS INCORRECT

ORA contends that “[t]his proceeding was intended to address not only whether the OMTP should be constructed, but whether it is necessary to construct the project at this time.”¹

¹ Interestingly, ORA relies on the following quote from D.04-06-011: “We will address the proposed Transmission System Enhancements in our consideration of SDG&E’s application, A.04-03-008, *including the question of whether that proceeding should be expedited.*” (ORA Opening Brief at 5, fn. 2 [emphasis in brief].) While the expedition of this “proceeding” would likely effect the ability of SDG&E to commence construction of the Transmission Project, it does not have any reasonable bearing on whether the Transmission Project must be

(ORA Opening Brief at 5.) The CAISO disagrees with ORA that the complete rejection or indeterminate deferral of transmission upgrades associated with the approved Otay Mesa Power Purchase Agreement (“Otay Mesa PPA”) can be reconciled with D.04-06-011. Indeed, the error of ORA’s interpretation can be exposed by examining whether the intent of D.04-06-011 in approving the Otay Mesa PPA can be realized without the construction, or timely construction, of the OMTP.

In D.04-06-011, the Commission approved the Otay Mesa PPA to serve as a local reliability resource “that will allow the utility to reduce its increasing [Reliability Must Run (“RMR”)] costs.” (D.04-06-011 at 77 [Finding of Fact 32 and 35].) Commissioner Brown similarly acknowledged that the Otay Mesa PPA constitutes a valuable “bird in hand” and stated that “[t]here are RMR [] benefits from building Otay, and benefits from substitution of cleaner, more efficient power.” (*Id.*, Brown Concurring at 3.) However, the Commission correctly recognized that “Otay Mesa will not be fully deliverable and cannot fully satisfy SDG&E’s local reliability needs, without some transmission system upgrade.” (*Id.* at 76 [Finding of Fact 30].) The CAISO corroborated this point in its testimony by stating that with only the interconnection upgrades approved by the California Energy Commission (“CEC”), “Otay Mesa cannot displace any RMR generation ... and does not contribute to SDG&E resource adequacy requirements.” (ISO-1 at 19:5-16.) Accordingly, the Commission instructed the CAISO to inform this proceeding “[w]hether **that** upgrade should be the two 238 kV lines proposed in A.04-03-008, or some alternative,” NOT whether an upgrade should be built at all or otherwise deferred. (*Id.* [emphasis added].)

Further, the Otay Mesa PPA and D.04-06-011 cannot, and should not, be divorced from the Commission’s post-energy crisis efforts to address SDG&E’s resource needs. In 2001, SDG&E applied to the Commission to construct the Valley-Rainbow 500 kV project. The primary justification advanced by SDG&E for the Valley-Rainbow project was a need for new

energized in sufficient time to accommodate the contractual on-line date of Otay Mesa in 2008. Simply put, the quote addresses the Commission’s process, not the Commission’s view of the substantive need for transmission upgrades to accommodate Otay Mesa generation.

transfer capacity by 2005 to allow SDG&E to satisfy applicable reliability criteria. D.04-06-011 confirms that Otay Mesa was viewed “as an alternative way to the transmission project to allow the utility to meet its grid reliability needs” and that Valley-Rainbow was denied on the “key assumption” that “Otay Mesa would be an in-basin generating resource available and capable of satisfying SDG&E’s local reliability grid capacity needs as of 2005.” (D.04-06-011 at 61 and 77 [Finding of Fact 35].) The CAISO explained in its opening testimony that “load growth must be addressed either through increasing the transmission import capacity or constructing additional generation **internal to the local reliability area.**” (ISO-1 at 4:15-19 [emphasis added].) Because the Commission recognized that Otay Mesa could not satisfy SDG&E’s local reliability needs without some transmission system upgrade beyond the minimal plan of interconnection, ORA’s interpretation conflicts with the clear intent of D.04-06-011 to approve the Otay Mesa PPA as a resource capable of fulfilling the local reliability benefits SDG&E originally sought from Valley-Rainbow.

From the above, it is clear that the Commission intended Otay Mesa to supply SDG&E with capacity that could contribute to meeting reliability criteria in the face of anticipated load growth. This establishes the “need” for the OMTP. Moreover, the fact that the Commission selected Otay Mesa as the preferred solution above other resource and technology solutions is equally manifest. As stated by Commissioner Brown in his concurring opinion:

Here is a plant that we know can meet the utility’s energy, capacity and reliability needs for 10 years starting in 2008. It is unclear whether there is another plant, or any combination of power plants, transmission projects and other solutions that can meet these needs for that time period. Although it is possible that the cost may be higher than we would like, we should strike while the iron is hot, because we should not take the risk of being caught short. (D.04-06-011, Brown Concurring at 3.)

Thus, the CAISO contests ORA's assertion that "there is no support for [the] conclusion" that Otay Mesa was chosen by the Commission to "meet further resource adequacy and local generation needs." (See ORA Opening Brief at 10.)

More importantly, these provisions of D.04-06-011 refute two of the recurring criticisms of the CAISO in ORA's opening brief. First, ORA suggests that the CAISO failed, but should have attempted, to determine whether the OMTP was "needed" based on an economic analysis. D.04-06-011 approved the Otay Mesa PPA to meet resource adequacy and local reliability needs. The transmission related to accomplishing this objective constitutes a reliability project for purposes of the CAISO Tariff. (See, CAISO Tariff 3.1, et seq.) Accordingly, it was wholly appropriate for the CAISO to accept the resource adequacy need determination by the Commission and consider economic factors solely in selecting the optimal transmission alternative for Otay Mesa. (ISO-2 at 5:16-7:8.)

Second, ORA claims that the CAISO did not study "other alternatives to provide SDG&E's optimal transmission solution for reducing the congestion that the OMTP is designed to relieve." (ORA Opening Brief at 6.) ORA similarly alleges that the CAISO "did not consider any alternatives that addressed how other resources in similar locations may further improve reliability with the proper transmission plan, while fully delivering power from Otay Mesa and relieving existing congestion." (*Id.*) While the CAISO is unsure what was intended by these assertions, the suggestion that the CAISO's evaluation was somehow too narrow is incorrect. To begin, as noted above, the Commission approved the Otay Mesa PPA, above other resource options, to provide SDG&E local capacity at its existing location and requested that the CAISO opine on the optimal transmission alternative to deliver power from this location. If there were a generation resource in a location close to Otay Mesa, then exactly the same transmission plan would be needed to deliver power from this resource.² In this regard, SDG&E and CAISO

² If ORA intends to imply that the CAISO should have evaluated other potential resources to meet the objective envisioned by the Otay Mesa PPA, the Commission precluded the need for such an effort. "As of today, Palomar and Otay Mesa provide the only possible sources of new generation with capacity over 500 MW, in SDG&E's service territory, that can serve SDG&E's needs in the foreseeable future." (D.04-06-011 at 60.)

studied numerous alternatives with the alternative included in the CPCN application selected as the optimal solution.

ORA's recommendation to defer the OMTP is equally incompatible with D.04-06-011. The Commission recognized that "SDG&E does not absolutely *need* the power from Otay Mesa during that [2008 through 2010] period." (D.04-06-011 at 68.) Nevertheless, based on the fact "that a significant amount of SDG&E's load demand is met by larger old units ... within SDG&E's service territory," the Commission noted that "there is a real risk that SDG&E could be short of power as soon as 2008 without Otay Mesa." (*Id.* at 69.) For this reason, the Commission viewed Otay Mesa as valuable "insurance." (*Id.* at 60.) Given that the "large old units" within SDG&E's service territory generally operate as RMR resources, a delay in constructing the OMTP would defeat the Commission's objective that Otay Mesa operate as insurance against the retirement or mothballing of these local units. Further building on this point, Finding of fact no. 32 provides: "While power from Otay Mesa is not needed to meet the 2007 – 2009 grid reliability shortfall, SDG&E established that Otay Mesa will provide state-of-the-art, low heat-rate, economical clean power to SDG&E's service area that will allow the utility to reduce its increasing RMR costs by utilizing Otay Mesa for those contracts, in lieu of the aging, expensive, inefficient units currently being used for those contracts." (*Id.* at 77.) Unless the OMTP is energized concurrently with the anticipated 2008 operation date of Otay Mesa, SDG&E ratepayers will not realize the full extent of the projected RMR cost savings upon which the Otay Mesa PPA was approved. ORA questions the size of these savings, but no party, including ORA, provided any evidence to refute SDG&E's estimated RMR cost savings.

The CAISO recognizes and appreciates ORA's position that the application of the OMTP has not followed the traditional regulatory process. Nevertheless, based on D.04-06-011, the CAISO believes the issue of "need" for the OMTP, or some functional equivalent, to provide for the deliverability of Otay Mesa generation has been decided. This proceeding must focus on whether the proposed OMTP constitutes the preferred alternative and, in this regard, ORA has

not challenged the CAISO conclusion that the OMTP is the preferred transmission solution to render Otay Mesa an in-basin, deliverable resource.

II. ORA INCORRECTLY IMPLIES THAT THE CAISO WILL NOT BE SEEKING BOARD OF GOVERNOR APPROVAL OF THE OMTP

ORA intimates that the present absence of any formal CAISO Board of Governors approval reflects a belief by the CAISO that the OMTP is not needed. The desired implication is incorrect. The CAISO stated in its reply testimony:

The fact that the CAISO Board of Governors has not yet approved the Project is just an issue of timing. Submission of the Project has been deferred because of the large number of transmission projects with costs over \$20 million that recently have been reviewed by the CAISO, including Palo Verde-Devers #2. CAISO staff prefers that the Board of Governors have ample opportunity to thoroughly review the transmission proposals and, therefore, has staggered the presentations for the various projects. Nevertheless, CAISO management has approved the Project and anticipates submitting the Project to the Board of Governors within the next two months. (ISO-2 at 4:10-21.)

Consistent with the CAISO's testimony, CAISO management intends to seek Board of Governors approval of the OMTP at its May 6, 2005, meeting.

III. ORA MISTAKENLY ASSOCIATES THE DWR SUNRISE CONTRACT WITH THE RELIABILITY BENEFITS OFFERED BY OTAY MESA

ORA asserts that "any reliability benefits SDG&E claims for the Otay Mesa plant must be discounted against benefits from the Sunrise contract, because that contract remains in SDG&E's portfolio for purposes of a decision in this proceeding." (ORA Opening Brief at 10.) ORA further argues that the expiration of the Sunrise contract constitutes an appropriate timeframe to delay approval of the OMPT. (*Id.*) This reasoning reflects a misunderstanding of SDG&E's local reliability needs and Sunrise's relationship to those needs.

SDG&E load is covered by local generation, in part, and by imported power, in part. With respect to imports, SDG&E has a 2500 MW Non-Simultaneous Import Limit, which

constitutes the maximum amount of power that can be delivered to SDG&E by the transmission system when the 500 kV Southwest Power Link (“SWPL”) is out of service. SDG&E’s peak customer load exceeds this import limit. The CAISO’s grid planning standards require that SDG&E have sufficient resources and import capacity to serve the 1-in-10 year peak summer demand for the local reliability area during an outage of the largest generator and one transmission facility (G-1/N-1 event). Accordingly, SDG&E’s service area may be considered a “load pocket,” requiring a certain minimum amount of generation physically located within its local reliability area. If load increases, either the SNIL transfer capacity or local generation must also increase. (See ISO-1 at 3:7-123 and 4:15-5:5.)

Sunrise does not effect SDG&E’s local reliability requirements because it is not an on-system resource, but rather is delivered to SDG&E as part of its overall transfer capacity. The Sunrise contract is resourced from units located in ZP-26, which is in PG&E’s service territory. In other words, Sunrise is part of the 2500 MW SDG&E can count on as an “import,” but it does nothing to increase transfer capacity or internal generation. In fact, as a result of recognized constraints on Path 26, the CAISO is contemplating an amendment to its operating procedure relating to emergencies (E-508) to specify a “Regional Reserve Emergency,” which may be declared when regional reserve requirements and load demand exceed available resources in either SP26 (SCE and SDG&E service territories) or NP26 (PG&E service territory) and congestion restricts the movement of resources into the specific subregion. The conclusion to be drawn is that the CAISO does not view ZP-26 resources as effectively mitigating capacity shortages in SCE and SDG&E’s service territories.³

IV. THE OMTP DOES NOT REPRESENT A “PIECEMEAL” APPROACH TO TRANSMISSION PLANNING

At several places in its opening brief, ORA laments that transmission problems in the SDG&E service area are at risk of being addressed in a “piecemeal” fashion if the OMTP is

³ See, “Response to Proposed Alternatives of the California Independent System Operator Corporation on Allocation of Certain Department of Water Resources Contracts,” R.04-04-003 (April 15, 2005) at pp. 4-5.

approved at this time. (ORA Opening Brief at 5 and 12.) ORA's fear is unfounded. As noted in the CAISO's opening testimony, the OMTP fits into the overall expansion plan for the South Bay area. The transmission line to Old Town will serve as a means to create a new 230 kV source in downtown San Diego. Presently, downtown San Diego is supplied from the Main Street 138/69 kV substation. This substation is over 40 years old, and its equipment is obsolete and unlikely to be sufficient to accommodate the current rate of load growth in the downtown area. (ISO-1 at 36:24-25.)

Although the final plan for South Bay is not finalized, preliminary indications point to replacement of the Main Street Substation with a new substation which will be served at 230 kV, not at 138 kV. The new Otay Mesa-Old Town 230 kV line will be looped into the new substation, thus creating a new source to supply the downtown. All 69 kV lines connected to the Main Street Substation will be re-routed to the new substation, and two 138 kV South Bay-Main circuits will be removed according to the Memorandum of Understanding between SDG&E and the City of Chula Vista. Without the OMTP, the new substation project will not be possible because of the absence of a 230 kV source to which the substation can connect. (ISO-1 at 36:24-25.)

V. ORA INCORRECTLY SUGGESTS THAT THE “ADDITIONAL” UPGRADES IDENTIFIED BY THE CAISO FOR THE OMTP COULD REPRESENT SUBSTANTIAL ADDITIONAL COSTS TO RATEPAYERS

The ORA appears to argue that the CAISO's testimony raises the specter that the OMTP will cost far in excess of that estimated by SDG&E because of certain additional upgrades identified by the CAISO. (ORA Opening Brief at 11.) The CAISO's testimony referenced three upgrades that SDG&E should construct prior to connecting Otay Mesa under the OMPT. (ISO-1 at 32:14-20.) The upgrades are:

1. Construction of the Old Town-Miguel Tap section of the new Otay Mesa-Old Town 230kV line with an emergency capability of at least 1176 MVA;
2. Reconductoring of the Poway-Pomerado 69kV transmission line to a capability of at least 175 MVA; and

3. Additional SPSs may need to be implemented. (ISO-1 at 32:14-20.)

As noted in the testimony, the Old Town-Miguel Tap is a part of the new Otay Mesa-Old Town 230 kV transmission line, which is included in the estimated cost of the OMTP. Again, with respect to the Poway-Pomerado 69kV line, the CAISO's testimony clearly indicates that the upgrade will be part of SDG&E's 2005 Grid Expansion Plan. The implication of this statement is that the line reconducting is needed even without the OMTP, and, therefore, its cost will not encumber the OMTP. Finally, a SPS or Special Protection Scheme is a common addition to new generation projects that involve relatively low costs, usually not exceeding \$100,000.

VI. CONCLUSION

For the reasons set forth above and in its opening testimony, the CAISO respectfully requests that the ALJ provide the Commission with a proposed decision finding that the OMTP is needed and constitutes the electrically optimal solution to achieving the Commission's objectives in approving the Otay Mesa PPA in D.04-06-011.

April 29, 2005

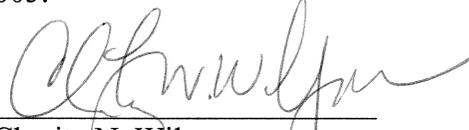
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PROOF OF SERVICE

I hereby certify that on April 29, 2005 I served, by electronic and United States mail, the Reply Brief of the California Independent System Operator Corporation in Docket #A.04-03-008.

DATED at Folsom, California on April 29, 2005.



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