

**COMMENTS ON BEHALF OF
THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE FEBRUARY 17, 2017 TRANSMISSION PLANNING PROCESS
STAKEHOLDER MEETING AND DRAFT 2016-2017 TRANSMISSION PLAN**

In response to the CAISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit their comments on the CAISO's February 17, 2017 Transmission Planning Process Stakeholder Meeting for the 2016/2017 planning cycle and on the January 31, 2017 draft Transmission Plan.

In particular, the Six Cities request that the CAISO clarify its description of the Lugo-Victorville 500 kV Upgrade project. As described in Sections 2.7.3.4 and 2.7.3.5, the Lugo-Victorville 500 kV line is jointly owned by the Los Angeles Department of Water and Power ("LADWP") and Southern California Edison Company ("SCE"). However, five of the Six Cities¹ hold contractual Entitlements to transmission service over the LADWP portion of this line, and one City has an Entitlement to service through the Victorville Substation.² These Entitlements are reflected on the Cities' respective Appendices A to the Transmission Control Agreement and are under the Operational Control of the CAISO. The Cities also have related Entitlements over the SCE system, which are likewise under the CAISO's Operational Control.

The Six Cities suggest that the CAISO include a footnote at Section 2.7.3.4 noting that the CAISO also has Operational Control over the Cities' Entitlements to transmission service on the LADWP and SCE portions of the Lugo-Victorville 500 kV line and at the LADWP Victorville Substation. Similarly, in the final paragraph of Section 2.7.3.5, the Six Cities request that the CAISO again note that the Cities hold Entitlements to transmission capacity over the LADWP portion of the line and at the Victorville Substation. To the extent that any of the \$16 million cost of LADWP's portion of this project is recoverable from the Six Cities, the Six Cities are entitled to reflect such costs in their respective Transmission Revenue Requirements. The

¹ Specifically, these five Cities include Anaheim, Azusa, Banning, Colton, and Riverside, California. In general, the Entitlements consist of specified quantities of capacity between the Adelanto Switching Station and the midpoint of the Lugo-Victorville line where the LADWP system meets the SCE system.

² Additionally, the City of Pasadena holds an Entitlement that provides for transmission service from Adelanto through the Victorville Substation to the Sylmar Station.

foregoing clarifications reflect that the CAISO's finding of need for this project pertains to the entirety of any project capacity that will be under the CAISO's Operational Control.

Submitted by,

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