

COMMENTS AND OBJECTION

Subject: CAISO Intention to Release Transmission Lines and Associated Facilities from Operational Control

Submitted by	Company	Date Submitted
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Wildflower Energy submits these comments and objection to the CAISO's June 27, 2012 notice of Intention to Release Transmission Lines and Associated Facilities from Operational Control. The CAISO proposes to relinquish operational control over certain 115kV facilities affected by the SCE Devers-Mirage split project. Wildflower owns the Indigo generation project, a 138 MW peaking facility located in the North Palm Springs area ("Indigo"). Indigo is tied into the Garnet substation via the Devers-Garnet-Indigo 115kV transmission facility. Both of these facilities would be included in the CAISO's proposal to relinquish operational control to SCE, and thus Wildflower may be impacted by the CAISO's proposal.

Wildflower objects to the CAISO's proposal because Wildflower has been unable to evaluate the basis or potential impacts of the CAISO's proposal. Section 4.7.2 of the CAISO Transmission Control Agreement provides that before the CAISO may relinquish control of transmission lines and associated facilities, the CAISO must inform the public "of its intention to do so and the basis for its determination." The purpose of this notice is to afford affected stakeholders an opportunity to evaluate the potential impacts of a change in operational control and then determine whether to object.

Other than identifying the facilities that would be included in the CAISO's proposal, the CAISO's June 27th 2012 notice provides insufficient information for Wildflower to evaluate the basis for the CAISO's proposal. During the 45 day objection period, Wildflower endeavored to evaluate the basis for the proposal as well as the potential impacts on the operation of Indigo. Representatives of Wildflower and its third-party offtaker corresponded with CAISO staff and SCE. However, neither CAISO nor SCE provided information necessary for Wildflower to evaluate the basis for the CAISO's proposal or the potential change in costs Wildflower will incur as a result of this proposal. Accordingly, Wildflower objects to the CAISO's proposal because it does not meet the procedural requirements specified in Section 4.7.2 of the Transmission Control Agreement. Wildflower requests that the CAISO provide additional detailed information regarding the basis of its proposal and the potential cost impacts on affected generators.