

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 17, 2015

Delphine Hou
External Affairs Manager, Regulatory Strategy
California ISO
250 Outcropping Way
Folsom, CA 95630

**Re: Data Request on SCE West of Devers Upgrade Project Draft EIR/EIS
CPUC Application No. A.13-10-020**

Dear Ms. Hou:

The California Public Utilities Commission's (CPUC) Energy Division received a data request from the California Independent System Operator (CAISO) on September 14, 2015. The request relates to information presented in the Draft EIR/EIS for the West of Devers Upgrade Project, published on August 7, 2015.

The attached pages present the CAISO request and our response. This response will be shared with the CPUC's service list for the proceeding and will be posted on the CEQA project website. Any questions on this information should be directed to me at (415) 703-2068.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager for West of Devers Upgrade Project
Energy Division CEQA Unit

Attachment

cc: Mary Jo Borak, CPUC Supervisor CEQA Unit
Molly Sterkel, CPUC Program Manager
Greg Heiden, CPUC Legal Division
Cleveland Lee, ORA
Christopher Meyers, ORA
Ryan Stevenson, SCE
Tom Dougherty, CAISO
John Kalish, Bureau of Land Management
Frank McMenimen, Bureau of Land Management
Susan Lee & Hedy Koczwar, Aspen Environmental Group
Service List for Proceeding A.13-10-020 (by email; see list on following page)

Service List - A.13-10-020 (West of Devers Upgrade Project)

Name		Title	Company	Representing
LAURA	RENGER	ATTORNEY	SOUTHERN CALIFORNIA EDISON COMPANY	Southern California Edison Co.
MICHAEL	DAY		GOODIN MACBRIDE SQUERI & DAY LLP	Palen Solar Holdings
LISA A.	COTTLE	ATTORNEY AT LAW	WINSTON & STRAWN LLP	NextEra Energy Resources, LLC
RACHEL	GOLD	POLICY DIRECTOR	LARGE-SCALE SOLAR ASSOCIATION	
UDI	HELMAN		HELMAN ANALYTICS	
JIM	KOBUS	RESEARCH	MORGAN STANLEY	
AMIE	JAMIESON	SR. ATTORNEY	NEXTERA ENERGY REOSURCES, LLC	
LUIS ALBERTO	GARCIA ALONSO		ABENGOA SOLAR LLC	
JEFF	SALAZAR		SOUTHERN CALIFORNIA GAS COMPANY	
STEVEN	HRUBY		SOUTHERN CALIFORNIA GAS COMPANY	
CASE	ADMINISTRATION		SOUTHERN CALIFORNIA EDISON COMPANY	
MARC T.	CAMPOPIANO		LATHAM & WATKINS LLP	
AUSTIN M.	YANG	DEPUTY CITY ATTORNEY	CITY AND COUNTY OF SAN FRANCISCO	
MATTHEW	FREEDMAN		THE UTILITY REFORM NETWORK	
JOHN L.	CLARK	ATTORNEY AT LAW	GOODIN, MACBRIDE, SQUERI & DAY LLP	
NANCY	SARACINO		CROWELL & MORING	
			CALIFORNIA ENERGY MARKETS	
WILLIAM	PETER		PACIFIC GAS AND ELECTRIC COMPANY	
ALEXEY	ORKIN		FLYNN RESOURCE CONSULTANTS INC.	
BARRY R.	FLYNN		FLYNN RESOURCE CONSULTANTS, INC.	
PUSHKAR G.	WAGLE	SENIOR CONSULTANT	FLYNN RESOURCE CONSULTANTS INC.	
KERRY	HATTEVIK	REG. DIR.- WEST GOVERNMENTAL AFFAIRS	NEXT ERA ENERGY RESOURCES LLC	
CLAY	JENSEN		BRIGHTSOURCE ENERGY	
MATT	STUCKY		ABENGOA SOLAR	
TANDY	MCMANNES		ABENGOA SOLAR LLC	
TIMOTHY	MCPMAHON		ABENGOA SOLAR LLC	

Attachment 1: Responses to CAISO Data Requests on Draft EIR/EIS West of Devers Upgrade Project

CAISO Request #1: The DEIR refers numerous times to the views of the CAISO and SCE (and only those organizations) regarding the 2024 Reliability base case and the level of generation viable in the region. One of the more complete such references is provided below:

“The CAISO’s 2024 Reliability base case, from the CAISO’s 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO’s and SCE’s perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. ”

Emphasis added. Bottom page 5, top of page 6, Attachment in Appendix 5 “West of Devers Upgrade Project / CPCN Application - A.13-10-020 / Project Alternatives Assessment / A Power Flow Analysis For Aspen Environmental Group By ZGlobal, Inc. / May 4, 2015

Please provide the specific CAISO document references relied upon in making the above statement.

Response: The statement quoted above is not an excerpt from a specific CAISO document. The power flow modeling presented in Draft EIR/EIS Appendix 5, Attachment 2, is based on two cases: the CAISO’s 2024 Summer Peak Reliability base case, and the CAISO’s Generation Cluster 7 Phase I, 2019 base case. The Draft EIR/EIS discussion of Basic Project Objective #1 (Draft EIR/EIS, p. A-11) is based on the modeling in the 2024 Reliability Base Case rather than the maximum scenario of all foreseeable generation projects within the Cluster 7 Phase I, 2019 base case. In developing this case, it is our understanding that the CAISO coordinates, collaborates, and reaches consensus with the Participating Transmission Operators (PTOs) and the other regulatory agencies. We understand that developing each case thus reflects SCE’s perspective, while also considering the California Energy Commission (CEC) Integrated Energy Policy Report (IEPR) demand forecast and decisions made within the CPUC Long Term Procurement Plan (LTPP) proceeding. The collaboration establishes the assumptions underlying every base case, including the load forecast, generation levels, RPS resource penetration levels and location, transmission upgrades, etc.

The relevant CAISO Study Plans for the 2013/2014 and 2014/2015 Transmission Planning Processes show how the viability of new generation must be categorized before including new generation in the planning cases. The 2024 Reliability Base Case, as used in the Draft EIR/EIS modeling, represents a 10-year planning case. Because the generation assumptions in the modeled case depend on the status of each new generation project, the status or viability must be interpreted by CAISO. For example, see Section 4.9 of the CAISO 2014-2015 Final Unified Planning Assumptions and Study Plan, March 31, 2014.¹

The Study Plan for the 2014/2015 Transmission Planning Process indicates that the 2024 CAISO reliability base case reflects the commercial interest portfolio consistent with RPS portfolios provided by CPUC and CEC, but RPS portfolios do not identify specific generation development projects. To model each individual generation unit, the CAISO assigns different levels of generation status, as there is some uncertainty at all levels of generation development.

¹ Available at: <https://www.caiso.com/Documents/2014-2015FinalStudyPlan.pdf>.

New generators are assigned one of the following levels:

- Level 1: Under construction
- Level 2: Regulatory approval received
- Level 3: Application under review
- Level 4: Starting application process
- Level 5: Press release only

In modeling a 10-year planning case, such as the 2024 Reliability Base Case used in the Draft EIR/EIS, we understand that the CAISO criteria for including new generation can be summarized as follows: only generation that is under construction or has received regulatory approval (Levels 1 and 2) or a PPA should be modeled in the area of interest of the initial power flow case. If additional generation is required to achieve an acceptable initial power flow case, then generation consistent with the approved LTPP can be used. In addition, generation from Levels 3, 4, and 5 can be used but only if they are outside of the area of study so that their impact on the facility addition requirements will be minimized.