

VIA ELECTRONIC MAIL

December 30, 2014

Ms. Billie Blanchard
Senior Analyst
Project Manager
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California Public Utilities Commission
505 Van Ness Avenue
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Re: ISO Response to the First Set of Data Requests Related to SCE's West of Devers Upgrade Project of the California Public Utilities Commission - Energy Division (CEQA Unit) in Docket No. A.13-10-010

Dear Ms. Blanchard:

Enclosed please find the California Independent System Operator's response to the first set of data requests served by the California Public Utilities Commission – Energy Division (CEQA Unit).

Please feel free to call me if you have any questions.

Sincerely,

/s/ Jordan Pinjuv

Jordan Pinjuv
Counsel
California Independent System
Operator Corporation

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

In the Matter of the Application of Southern California Edison Company (U338E) for a Certificate of Public Convenience and Necessity for the West of Devers Upgrade Project and for an Interim Decision Approving the Proposed Transaction Between Southern California Edison and Morongo Transmission LLC

A.13-10-020

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO THE FIRST SET OF DATA REQUESTS RELATED TO SCE'S WEST OF DEVERS UPGRADE PROJECT OF THE
CALIFORNIA PUBLIC UTILITIES COMMISSION – ENERGY DIVISION (CEQA UNIT)**

Below are responses to the First Set of Data Requests served by the California Public Utilities Commission – Energy Division (CEQA Unit).

Request No. 1.

The CPUC is considering alternatives to SCE's Proposed Project that may add 12 months to SCE's proposed construction timeframe. Please describe the specific consequences of a 12 month delay in energizing the new transmission line. What known projects would be affected in terms of their deliverability?

ISO RESPONSE TO No. 1.

The delay of West of Devers (WOD) Upgrades would impact the following:

- *Deliverability of generator interconnection projects in the queue;*
- *Maximum Import Capacity from IID; and*
- *Distributed Generator (DG) deliverability.*

The CAISO addresses each of these in detail below.

1. Deliverability of Generator Interconnection Projects in the Queue.

The following generator interconnection projects currently active in the CAISO controlled grid generation queue or SCE WDAT generation queue require West of Devers upgrade in service to achieve their requested Full Capacity Deliverability Status.

Table 1: Projects Requiring WOD Upgrades

Cluster Group	Queue Position	MW	POI	Commercial Operation Date
TC	365	500	Red Bluff 220kV	6/1/2019
	421	49.5	Red Bluff 220kV	2/1/2012*
C2	576	224	Colorado River 220kV	10/1/2016
C3	643AE	150	Red Bluff 220kV	9/1/2016
C4	798	221	Colorado River 220kV	12/31/2016
C6	970	150	Colorado River 220kV	12/31/2016
C7	1070	250	Red Bluff 220kV	12/1/2017
	1071	150	Colorado River 220kV	12/31/2016
	1072	100	Devers 220kV	11/1/2017
Total		1794.5		
Cluster Group	Queue Position	MW	POD to CAISO Controlled Grid	In-Service Date
Serial	WDT357	20	Blythe 33kV	online
Serial	WDT440	5	Devers 220kV	7/1/2014*
Serial	WDT668	14.64	Valley 115kV	4/1/2016
C4	WDT786	14.64	Valley 115kV	11/15/2013*
C6	WDT1033	13	Valley 115kV	10/1/2016
C7	WDT1177	20	Valley 115kV	4/30/2014*
	WDT1178	20	Valley 115kV	4/30/2014*
	WDT1186	20	Devers 220kV	1/5/2018

	WDT1194	85	Valley 115kV	2/1/2019
	WDT1196	200	Valley 11kV	2/1/2019
Total		412.28		

**Dates are no longer valid and to be determined during the generator interconnection agreement negotiation.*

They all have COD before 2020. The operational deliverability assessment performed during the CAISO Queue Cluster 6 Phase II Interconnection Study determined that the WOD constraint becomes binding in 2016. The projects will have Energy Only Deliverability Status until the WOD Upgrades are in-service. Delaying the upgrades will delay when the projects could achieve Full Capacity Deliverability Status.

The Delaney – Colorado River 500kV upgrade is targeted to be in service in 2020 to coincide with the in-service date of the WOD upgrades. If Delaney – Colorado River 500kV is completed before the WOD upgrades, then the economic benefits associated of the project with increased import capability will not accrue until the WOD upgrades are completed. Completion of the Delaney-Colorado River 500 kV project prior to the WOD upgrades would also further aggravate the WOD constraint. Some of the generators not listed above and not requiring WOD Upgrades for Full Capacity Deliverability Status may get a net qualifying capacity (NQC) reduction. Projects with impacted NQC are listed below.

Table 2: Projects NQC Impacted by WOD Upgrades

Cluster Group	Queue Position	MW	POI	Commercial Operation Date
Serial	17	520	Colorado River 500kV	1/2/2018
	138	150	Devers - Vista 220kV No. 1	9/30/2020
	146	150	Red Bluff 220kV	online
	147	400	Red Bluff 220kV	online
	219	50	Colorado River 500kV	1/2/2018
TC	193	500	Colorado River 220kV	online
	294	485	Colorado River 220kV	7/1/2017
Cluster Group	Queue Position	MW	POD to CAISO Controlled Grid	In-Service Date
Serial	WDT1056	100.5	Devers 220kV	7/1/2011*

**Dates are no longer valid and to be determined during the generator interconnection agreement negotiation.*

2. Maximum Import Capability from IID

In addition, the WOD constraint limits the Maximum Import Capability (MIC) from IID to CAISO Controlled Grid. To support renewable development in IID, the CAISO approved MIC expansion from IID. Currently the MIC from IID is 462 MW and is expected to be increased to a minimum of 662 MW once the WOD upgrades are completed. . This MIC expansion is contingent on sufficient downstream transfer capability, including the WOD capability. IID is part of the Imperial renewable zone which can accommodate approximately 500 MW to 750 MW of additional renewable generation identified in the 2014-2015 planning cycle that is not already under contract to load serving entities in the ISO. However this additional deliverability in the Imperial renewable zone is also contingent on the completion of the WOD upgrades. Therefore, these renewables won't be deliverable if the WOD Upgrades are not in service.

3. Distributed Generation Deliverability

The WOD constraint also limits distributed generation (DG) Deliverability in the Devers area. In the 2014-2015 planning cycle, the deliverability at the following DG Nodes are eliminated due to the WOD constraint.

Node	Base Portfolio MW	Highest Portfolio MW
DEVERS 220kV	0	11.20
EAGLE MOUNTAIN 220kV	0	13.91
VALLEY 115kV	0	0.32

Until WOD Upgrades receive the regulatory approval, no DG Deliverability will be assigned at DG nodes contributing to WOD constraint. After the WOD Upgrades receive the regulatory approval, DG Deliverability may be assigned at these DG nodes. However, the DGs assigned deliverability can't have Full Capacity Deliverability Status until WOD Upgrades are in service.