

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate  
And Refine Procurement Policies and Consider Long  
Term Procurement Plans

Rulemaking 12-03-014  
(Filed March 22, 2012)

RESPONSE OF THE UTILITY REFORM NETWORK  
TO THE JOINT MOTION OF THE DIVISION OF RATEPAYER  
ADVOCATES, CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE,  
AND SIERRA CLUB CALIFORNIA TO AMEND THE REVISED SCOPING  
MEMO TO REFLECT THE CLOSURE OF THE SAN ONOFRE NUCLEAR  
POWER STATION GENERATION FACILITIES



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July 15, 2013

**RESPONSE OF THE UTILITY REFORM NETWORK  
TO THE JOINT MOTION OF THE DIVISION OF RATEPAYER  
ADVOCATES, CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE,  
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MEMO TO REFLECT THE CLOSURE OF THE SAN ONOFRE NUCLEAR  
POWER STATION GENERATION FACILITIES**

Pursuant to Rule 11.1(e) of the Commission Rules of Practice and Procedure, The Utility Reform Network (TURN) submits this response to the June 28<sup>th</sup> Joint Motion of the Division of Ratepayer Advocates, California Environmental Justice Alliance, and Sierra Club California (*hereafter "Joint Parties"*).<sup>1</sup> The Joint Parties ask the Commission to request that the California Independent System Operator (CAISO) include in its Track 4 modeling certain amounts of sources of "reactive power" in addition to those resources already specified in the May 21 Revised Scoping Ruling.<sup>2</sup> TURN supports the motion.

As the Joint Motion documented, the CAISO's past modeling assessing the impacts of losing SONGS generation showed reactive power as a means of meeting part of the local reliability needs in Southern California that arise without SONGS generation. The impact reactive power alternatives should be considered by this Commission in assessing how to respond to the SONGS retirement. To be considered by the Commission, such alternatives must be included in the various studies the CAISO and other parties will submit next month pursuant to the Scoping Ruling. But Attachment A to the Commission's Scoping Ruling did not directly address that specific assumptions regarding sources or quantities of reactive power be included in such studies.

It is important for the Commission to provide such direction to the CAISO. Further, TURN believes such direction should apply not just to the CAISO but also to Southern

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<sup>1</sup> Since 15 days after the initial filing falls on Saturday, July 13<sup>th</sup>, this response is timely.

<sup>2</sup> The CAISO is conducting such modeling to estimate the system enhancements needed to meet local reliability needs in Southern California now that SCE has made a firm decision to retire the San Onofre Nuclear Generating Station (SONGS).

California Edison Company and other parties that may submit similar studies as well.<sup>3</sup>  
TURN therefore urges the Commission to grant the Joint Parties' motion.

Respectfully submitted,

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Dated: July 15, 2013

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<sup>3</sup> It is possible that Attachment A's references to the CAISO's 2012/2013 Transmission Planning Process were interpreted by the CAISO to request such inclusion of reactive power in its modeling or that the CAISO was planning to do so for other reasons. If so, the Joint Parties' motion may be moot. But TURN believes it important that these assumptions be clearly specified well before the CAISO's August 5 filing deadline and the August 26 filing deadline for SCE and possibly other parties.

**VERIFICATION**

I, Matthew Freedman, am an attorney of record for THE UTILITY REFORM NETWORK in this proceeding and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true of my own knowledge, except for those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am making this verification on TURN's behalf because, as the lead attorney in the proceeding, I have unique personal knowledge of certain facts stated in the foregoing document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 15, 2013, at San Francisco, California.

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Matthew Freedman  
Staff Attorney