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

Order Instituting Rulemaking to Integrate and	)	
Refine Procurement Policies and Consider	)	R.12-03-014
Long-Term Procurement Plans.	)	(Filed March 22, 2012)

## CITY OF REDONDO BEACH'S REPLY COMMENT ON TRACK 4 SCHEDULING ISSUES

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Dated: September 13, 2013

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In the "Comments of the California Independent System Operator Corporation on Proposed Track 2 and Track 4 Procedural Schedules" (ISO Comments), the corporation (ISO) introduced the following alternative recommendation concerning Administrative Law Judge David M. Gamson's proposal for the Track 4 schedule:

"The ISO would be able to provide additional testimony about the transmission alternatives under consideration- and the resource needs associated with each alternative prior to the time that Commission issues an interim decision. This information would not be study results; as noted above, these will not be available until December at the earliest. However, the information that the ISO can provide would elaborate on the scope of the ongoing ISO analysis, and the potential changes in local area needs that would occur if transmission upgrades were added to the system. This information would inform the interim decision and, assuming that the decision takes these alternatives into consideration, the method for SCE and SDG&E to procure more or less than authorized in the interim decision could be specifically addressed in a narrowly-focused second inquiry.

"The ISO proposes this schedule as a Track 4 alternative:

- September 23, 2013 interveners submit testimony; SCE, SDG&E, the ISO and the City of Redondo Beach submit testimony on the additional topics
- October 7, 2013 ISO submits testimony about transmission alternatives under consideration
- November 6, 2013 parties submit rebuttal testimony
- November 18-22, 2013 evidentiary hearing, if necessary
- Interim decision issued in Q1 2014
- March 2014 ISO submits Board approved transmission plan
- Parties can comment on whether the interim decision should be modified and whether additional hearings are needed based on the ISO transmission plan"

(ISO Comments, p. 7.)

In response to ISO's alternative recommendation for the Track 4 schedule, the City of Redondo reiterate's its opposition to any interim decision on procurement authorization. For the reasons stated in "the City of Redondo Beach's Comment on Track 4 Scheduling Issues," any decision to increase or decrease the procurement authorized in Track 1 should be fully informed by ISO's 2014-2015 transmission study results or, at a minimum, the final results from the 2013-2014 study. Issuance of an interim decision before the final transmission study results risks authorization of procurement that will ultimately be found to be unnecessary. As ISO's observes, there is a "very distinct possibility that transmission alternatives could change the need for local resources in the study area." (ISO Comments, p. 4.)

Dated: September 13, 2013 Respectfully Submitted,

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