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February 23, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: DRECP NEPA/CEQA Comments

To Whom It May Concern:

I write this letter as my personal comment regarding the Desert Renewable Energy Conservation Project. I fully support the County of San Bernardino's position letter (incorporated herein by reference) as well as the Basin and Range Watch's comments dated January 30th, and the joint letter by Alliance for Desert Preservation and Mojave Communities Conservation Collaborative, dated February 20 (incorporated herein by reference).

The DRECP in its current form is FAR too destructive to all species; plant, wild-life and human. The REAT must reconsider this singularly-focused approach to achieve renewable energy generation. Go back to the drawing board and create an Alternative that encompasses Point of Use Distributed Energy Generation, Demand Reduction and incentivizes energy efficiency.

The DRECP makes an error of irreparable proportions with its Purpose and Need in its intent to achieve renewable generation solely by the propagation of industrial-scale renewable energy projects in our California deserts. I offer the following reasons:

Point of Use Distributed Generation is a far superior strategy. Renewable energy can and should be generated in the urban areas where it will be consumed without the costly economic, social and environmental impacts of large, remote, renewable-energy generation projects. These projects in turn create the need for huge prohibitively expensive transmission to ship the energy out of our desert to the urban areas where it is be consumed. The accomplishment of this approach is long-term financial viability afforded by incentives from our tax dollars for private commercial ventures and guaranteed increased rates along with huge sprawling transmission projects for Investor Owned Utilities, paid for by us, the ratepayers. A perfect example is the Southern California Edison Coolwater Lugo Transmission Project (CLTP) with an estimated cost of \$1,000,000. The actual cost to rate-payers for this \$1,000,000 project over thirty years becomes \$45,000,000 +/- . This project which is officially opposed by the CPUC's own Office of Ratepayers Advocates (September 27, 2013 Protest as well as January 22, 2015 Comment regarding Proceeding is attached hereto as Attachment 1 and Attachment 2, incorporated by reference) would be a gross misuse of ratepayer dollars. This is a needless transmission project intended to lure industrial scale renewable energy into a diverse carbon sequestering desert ecosystem comprised of avian and wildlife corridors and well-established rural communities, where projects of this scale should never be permitted.

Large solar and windmill projects are not "green". What sense does it make to sacrifice nature the name of saving it? As proposed the draft DRECP, would fast-track these projects, allowing the take of endangered species, causing the destruction of natural habitat and undisturbed desert land in the process. Renewable energy that encompasses such damage, endangers wildlife, uses gross amounts of water in an arid, parched drought-ridden desert, disturbs native carbon-sequestering plant life and consumes huge amounts of fossil fuels to keep these "green" projects operating ***IS NOT*** environmentally preferable. We are just beginning to see a glimpse of the destructive results of Ivanpah. What the real long-term impacts will be; no one knows. At first this project was one of the most-touted renewable energy advocates success stories. Now, it is a poster-child for what should not be permitted in ANY of our desert lands.

Rural communities and RESIDENTS adjacent to these projects will be adversely impacted. Large-scale renewable energy projects can cause a myriad of problems from air quality issues from dust with PM-10 and PM 2.5, there is a huge potential for incidents of Valley Fever which is never mentioned, much less assessed in the current draft DRECP. Loss of dark night skies, exposure to EMF from transmission lines, de-valuated property values to name a few. All these impacts to our human element cannot be ignored. How do you mitigate these impacts? A "Take Permit" on homo-sapiens? What is the formula for the acceptable loss ratio? Hope we don't make an error.

Please reconsider this debacle of a Plan. There is no doubt that action must be taken to correct our course, and we need to find smarter ways to generate energy. We are a country with technology that takes us to Mars. Let's give incentives that reward and encourage research and development in order to find *real* solutions that will achieve the generation we need with a fraction of the displacement currently required.

Rather than "Smart From the Start" the goal should be "More (generation) with Less (destruction)!!"

Sincerely,

Lorrie L. Steely

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
Coolwater-Lugo Transmission Project.

Application 13-08-023
(Filed August 28, 2013)

**PROTEST OF THE DIVISION OF RATEPAYER ADVOCATES
TO SOUTHERN CALIFORNIA EDISON COMPANY'S COOLWATER-
LUGO TRANSMISSION PROJECT APPLICATION FOR A
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure (Rules), the Division of Ratepayer Advocates (DRA) files this protest to Southern California Edison's ("SCE") Application (A.) 13-08-023 for a Certificate of Public Convenience and Necessity ("CPCN"). The Application raises several areas of concern that merit further review. Therefore, the Division of Ratepayer Advocates ("DRA") recommends that the Commission schedule both evidentiary and public participation hearings for this proceeding.

II. APPLICATION

In A. 13-08-023, SCE proposes to construct Coolwater Lugo Transmission Project ("CWLTP") with the following components:¹

¹ SCE Application 13-08-023, pages 2-4.

Substations:

- Reconfigure Coolwater 220 kilovolt (kV) Switchyard;
- Terminate new Coolwater-Desert View 220 kV Transmission Line at the Coolwater and Desert View 220 kV buses;
- Install new relay buildings and necessary equipment to support the Special Protection System ("SPS") at Coolwater 220 kV Switchyard;
- Expand the Lugo 500 kV Switchrack to the south five positions;
- Relocate two existing 500 kV transmission line terminations at Lugo Substation;
- Terminate new Desert View-Lugo 500 kV transmission line construction, initially energized at 220 kV at the Desert View and Lugo 220 kV buses;
- Install one additional 500/220 kV transformer bank at Lugo Substation;
- Construct new relay building and install bank protection relays at Lugo Substation;
- Install new protection, control, and SPS at Lugo Substation; and
- License proposed Desert View 500/220/115/12 kV Substation ("Desert View Substation") and initially construct the facilities necessary to loop the Coolwater-Lugo 220 kV Transmission Line and consolidate the Lugo- Pisgah No.1 and No.2 220 kV Transmission lines into Desert View Substation.

Transmission and Telecommunication:

- Remove approximately 29.1 miles of the existing Lugo-Pisgah No.1 220 kV transmission line from Lugo Substation northeast to approximately the intersection of Haynes Road and State Route 247 ("SR-247");
- Remove approximately 16.0 miles of the existing Lugo-Pisgah No.2 220 kV transmission line from Lugo Substation northeast to proposed Desert View Substation and terminate the remaining portion of this line into the proposed Desert View Substation;
- Construct 16.6 miles of 500 kV single-circuit transmission line (initially energized at 220 kV) from Lugo Substation to the proposed Desert View Substation and 13.6 miles of 220 kV double-circuit transmission line in existing ROW from proposed Desert View Substation to approximately the intersection of Haynes Road and SR-247;
- Construct approximately 34.0 miles of 220 kV double-circuit transmission line from Coolwater 220 kV Switchyard south to the existing Lugo-Pisgah transmission corridor, located approximately near the intersection of Haynes Road and SR-247;

- Install a new 150-foot tall microwave tower and foundation at the existing Coolwater 220 kV Switchyard;
- Install lightwave transponder equipment or optical amplifier and channel bank equipment at Coolwater Switchyard, Lugo Substation, and the proposed Desert View Substation;
- Install approximately 11.0 miles of Fiber-Optic Cable from existing Apple Valley Substation to the proposed Desert View Substation; and
- Install approximately 29.0 miles of Fiber-Optic Cable from existing Pisgah Substation near Newberry Springs to the existing Gale Substation near Daggett.

SCE's asserted purposes of the CWLTP are (1) to provide additional transmission capacity to help alleviate the 220 kV transmission bottleneck between the existing Kramer and Lugo Substations, (2) to facilitate interconnection of renewable generation projects to accommodate future load serving in the Town of Apple Valley, and (3) to facilitate additional system reliability.

SCE also asserts that CWLTP will facilitate delivery of power from the new planned generation resources located in the Barstow, Inyokern, Kramer, Lucerne Valley/future Jasper Substation, Apple Valley, and Owens Valley areas.

SCE adds that the Coolwater-Lugo Transmission Line was identified as needed in interconnection studies performed by California Independent System Operator ("CAISO") and SCE.² The minimum build out of Desert View Substation is required to facilitate construction of the proposed Coolwater-Lugo Transmission Line, and full build-out would be dependent upon future CAISO approval.

III. ISSUES

While DRA is still reviewing the Application, so far it has identified several issues that it intends to investigate further.

First, the CWLTP described in the Application has not been approved by CAISO. It is unclear what study SCE is using to justify this proposed project. In the absence of a supporting study, DRA urges the Commission to find the Application to be incomplete and dismiss it

² SCE Application, at 2.

without prejudice to SCE re-filing with a supporting study. Pursuant to Commission Rule of Practice and Procedure 11.1c, DRA intends to make an oral motion at the Pre Hearing Conference to dismiss the Application unless SCE produces the requisite supporting study for the version of the project it proposes.

Also, if SCE later modifies the scope of the project, SCE should be required to provide studies in support of the modified scope and parties should be granted adequate time for discovery on the revised project.

Second, DRA notes that the project scope of the CWLTP that SCE submitted to the Commission for approval is bigger than that studied by CAISO. In contrast to the project SCE has submitted to the Commission, CAISO, in its 2012-2013 transmission plan, studied a version of the CWLTP that consists of the following elements:³

- a. Coolwater-Lugo 220kV Transmission Line: Install a new 59 mile 220kV transmission line including the following elements:
 - i. approximately 16 circuit miles of 2B-2156 KCMIL ACSR conductor
 - ii. approximately 43 circuit miles of 2B-1590KCMIL ACSR conductor
 - iii. ½ inch steel overhead ground wire as needed
 - iv. approximately 59 miles of OPGW (315,000 linear feet)
- b. Coolwater Generating Station 220kV Switchyard: Install necessary equipment to terminate the new Lugo 220kV transmission line in a breaker-and-a-half configuration.
- c. Lugo Substation: Install the necessary equipment to terminate the Coolwater 220kV transmission line in a new double breaker line position arranged in a breaker-and-a-half configuration.

The CPUC requested CAISO to study the AV Clearview transmission project, which was proposed by Critical Path Transmission, Inc., as an alternative to the CWLTP. CAISO finished its initial study of AV Clearview and documented the study result in its 2012/2013 transmission

³ CAISO 2012-2013 Transmission Plan, at 150.

plan. However, CAISO is further studying the AV Clearview transmission project and is yet to submit its testimony to the Commission.⁴

According to the CAISO 2012-2013 transmission plan, both the AV Clearview transmission project and the Kramer Remedial Action Scheme ("RAS") are alternatives to the Coolwater-Lugo Transmission Line.⁵ In general, RAS costs a lot less than transmission line alternatives. The Commission should consider the AV Clearview transmission project and the Kramer RAS as alternatives to the CWLTP before making its final decision on SCE's application.

Third, DRA observes the following specific problems with SCE's application. DRA intends to propound discovery requests to SCE to address these concerns.

- 1) SCE did not explain whether its assumed renewable generation capacity used as justification for this project was based on the renewable planning scenario that was developed and approved by the CPUC in the LTPP proceeding.
- 2) SCE discussed the need to serve future load in the Town of Apple Valley, but did not explain whether the load forecast for the Town of Apple Valley was based on the load forecast by the California Energy Commission.
- 3) SCE did not discuss whether its current transmission system is violating the Federal Energy Regulatory Commission (FERC) reliability standard and also did not articulate why additional reliability is needed.
- 4) SCE did not explain why approximately 29.1 miles of the existing Lugo-Pisgah No.1 220 kV and approximately 16.0 miles of the existing Lugo-Pisgah No.2 220 kV are no longer useful and need to be removed.
- 5) SCE has asserted that the minimum build out of Desert View Substation is required to facilitate construction of the proposed Coolwater-Lugo Transmission Line. Absent additional supporting evidence, DRA is not convinced that SCE's proposed 500 kV Desert View Substation is needed for the CWLTP.
- 6) SCE asserted that the full build-out of the 500 kV Desert View Substation will depend upon future CAISO approval. DRA is concerned that if future CAISO studies conclude that the 500 kV Desert View Substation is not needed, the SCE proposed Desert View Substation, including the minimum build out, and the 16.6 miles of 500 kV single-circuit

⁴ CAISO 2013-2014 Transmission Plan Stakeholder Process presentation on September 25.

⁵ CAISO 2012-2013 Transmission Plan, at 279.

transmission line (initially energized at 220 kV) from Lugo Substation to the proposed Desert View Substation will no longer be necessary and will result in waste at ratepayers' expense.

Fourth, the cost, including the contingency factor, of SCE's proposed CWLTP appears excessive compared to what the Commission has approved for similar past projects. DRA intends to explore these issues and conduct further discovery regarding them before making a final recommendation to the Commission.

SCE asserts that for the "minimum" CWLTP, the direct cost will be \$559 million, and the total cost, with a 35% contingency factor, will be \$755 million. SCE also asserts that for the "full" CWLTP, the direct cost will be \$776 million, and the total cost, with a 35% contingency factor, will be \$1,047 million.⁶ DRA observes that the direct cost, including but not limited to licensing cost of \$36 million, substation cost of \$132 million, transmission (>200 kV) cost of \$274 million, telecommunication cost of \$9 million, and environmental cost of \$77 million, is extremely high. DRA will further examine the cost of these items to determine if they are just and reasonable.

The proposed contingency factor is extremely high compared to others approved by the Commission for similar projects. For example, the Commission recently approved a 15% contingency factor for the Chino Hills portion of the Tehachapi Renewable Transmission Project.⁷ DRA will explore whether a lower contingency factor is just and reasonable during the proceeding.

IV. CONCLUSION

SCE's Application requesting a CPCN for the CWLTP does not clearly demonstrate that the project is needed. Moreover, other alternatives should be carefully studied and compared with the CWLTP. It also appears that the direct cost of the CWLTP as proposed by SCE may be overstated and the contingency factor too high. DRA will conduct discovery to develop its testimony and recommendations on the issues noted in this protest, and possibly on additional

⁶ SCE's Application Appendix H provides information about the "minimum", "initial", and "full" direct costs associated with the proposed project.

⁷ D.13-07-028 at 43.

issues that may come to light as a result of discovery and further analysis. Hearings may be required and a schedule should be established at the prehearing conference that allows for a diligent review of SCE's application.

Respectfully submitted,

/s/ DARRYL GRUEN

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September 27, 2013

Attachment 2

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
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In the Matter of the Application of
SOUTHERN CALIFORNIA EDISON
COMPANY (U338E) for a Certificate of
Public Convenience and Necessity
regarding the Coolwater-Lugo
Transmission Project.

Application 13-08-023
(Filed August 28, 2013)

**THE OFFICE OF RATEPAYER ADVOCATES' REPLY TO
SOUTHERN CALIFORNIA EDISON COMPANY'S
AND MOJAVE SOLAR LLC'S COMMENTS**

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January 22, 2015

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
Regarding the Coolwater-Lugo
Transmission Project.

Application 13-08-023
(Filed August 28, 2013)

**THE OFFICE OF RATEPAYER ADVOCATES' REPLY TO
SOUTHERN CALIFORNIA EDISON COMPANY'S
AND MOJAVE SOLAR LLC'S COMMENTS**

1 INTRODUCTION

In accordance with the Administrative Law Judge (ALJ) Ruling dated December 3, 2014, (December 3 ALJ Ruling), the Office of Ratepayer Advocates (ORA) replies to the Comments of the Mojave Solar LLC (Mojave Solar) and the Southern California Edison Company (SCE), which were filed and served on January 8, 2015. CAISO does not appear to have submitted comments. This Reply is timely filed and served in accordance with the December 3 ALJ Ruling, which set January 22, 2015, as the deadline for other Parties' replies to these Comments.

2 BACKGROUND

On October 24, 2014, NRG California South LP (NRG), the owner and operator of the existing Coolwater Generating Station (Coolwater GS) near Daggett, California, notified the Commission that NRG will shut down and mothball the Coolwater GS as of January 1, 2015.¹

¹ Letter from J. Chillemi, NRG President, to P. Clanon, Commission Executive Director, dated Oct. 24, 2014, attached to Dec. 3 ALJ Rul'g.

On December 3, 2014, an ALJ Ruling directed SCE, Mojave Solar, and the California Independent System Operator Corporation (CAISO) to address the impact of the Coolwater retirement, specifically as follows:

- SCE is directed to address whether the components identified as the “minimum,” “initial” and “full” buildout are still needed.
- SCE, the CAISO, and Mojave Solar . . . are directed . . . to address the impact of the Coolwater retirement on the need for the components identified as necessary to satisfy the terms of the LGIA [Large Generator Interconnection Agreement].
- SCE is directed to address the status of its Amended Application and PEA if SCE finds that the Coolwater retirement obviates the need for the CLTP [Coolwater-Lugo Transmission Project] as proposed.
- If the need for the CLTP still exists as described in the Amended Application and Amended PEA [Proponent’s Environmental Assessment], SCE’s comments shall address the impact of the Coolwater retirement on the timing of the need for the components of the proposed CLTP.²

In its January 8 Comments, SCE answered the December 3 ALJ Ruling’s inquiries as follows:

- The timing and need for CLTP in the minimal, initial, or full build-out configurations remain unchanged by NRG’s announcement to permanently retire the Coolwater GS.
- Since NRG has not stated its intentions regarding the potential repower of generation at the Coolwater GS, the need for the CLTP components that satisfy the terms of the LGIA remains unchanged.
- Even though the Coolwater GS has permanently retired, absent NRG’s commitment not to repower or restart the Coolwater GS, parties must assume NRG’s

² Dec. 3 ALJ Rul’g at 3.

rights to deliverability priority are and will remain unchanged; and thus the status of the Amended Application and PEA remains unaffected.³

The Mojave Solar January 8 Comment basically agrees with the SCE's Comment stated above, i.e., the Coolwater retirement does not change the "underlying need for the CLTP." However, Mojave Solar views only the Minimum Buildout Option as proposed by SCE to be still needed.⁴

3 ORA'S REPLY

3.1 With the Coolwater GS closure, SCE and Mojave Solar have not justified "the need for the CLTP project as identified in SCE's Amended Application and [the] project needs and objectives stated in the Amended PEA."

Basically, SCE and Mojave Solar claim that the Coolwater GS retirement does not obviate the need for CLTP project. According to SCE, under the Tariff and Reliability Requirements of CAISO's Business Practice Manual (BPM), if NRG were subsequently to restart Coolwater GS or repower generation at the site, this would maintain its "deliverability priority rights." NRG's Coolwater GS would lose its deliverability priority if it were incapable of operating for any consecutive three-year period "at the capacity level associated with its rated deliverability."⁵ Alternatively, even after the end of such three-year period, Coolwater GS could still retain its deliverability priority rights if NRG could "demonstrate that it's actively engaged in the construction of replacement generation to be connected at the bus associated with the deliverability option."⁶

If NRG were to relinquish its deliverability priority for the Coolwater GS, CAISO could allocate it to other generators. At such time, CAISO would have to conduct new

³ See SCE Jan. 8 Comm'ts at 7.

⁴ See Mojave Solar Jan. 8 Comm'ts at 7:

Because there is no guarantee that Coolwater's Closure will make any firm capacity on SCE's grid available to Mojave Solar, now or in the future, the CLTP network upgrades continue to be necessary to alleviate the constraints on SCE's system and to ensure full deliverability of Mojave Solar.

⁵ CAISO BPM, sec. 5.1.3.4, as quoted by SCE Jan. 8 Comm'ts at 3.

⁶ *Id.*

transmission planning and generator interconnection studies (i) to evaluate if any upgrades would be needed in the High Desert Region for renewable portfolio standard (RPS) and reliability considerations; and (ii) to provide Full Capacity Deliverability Status (FCDS) deliverability for Mojave Solar.⁷

The SCE and Mojave Solar January 8 Comments, however, fail to present any facts showing that NRG would likely restart, repower, or rebuild generation at the Coolwater GS site in the foreseeable future. As the December 3 ALJ Ruling notes:

NRG has no power purchase agreements with any party. Without power purchase agreements in place or anticipated for the future, NRG states that it is not prudent to continue operating Coolwater.⁸

SCE and Mojave Solar fail to show any reasonable possibility that NRG will obtain the power purchase agreements that would enable NRG to avoid relinquishing its deliverability priority.⁹ Therefore the Coolwater retirement obviates the need for this proceeding at this time and the Amended Application should be accordingly dismissed without prejudice.

3.2 The CLTP is not needed to provide adequate power transfer capability to meet Mojave Solar's Resource Adequacy requirements.

With the retirement of the Coolwater GS, the power transfer capability on the transmission path between the Kramer and Lugo substations could be used to provide full capacity deliverability for Mojave Solar. This would enable Mojave Solar to pursue the existing power transfer capabilities for qualifying its generation capacity as Resource Adequacy, instead of building new transmission lines under the CLTP, which would be less economical and more costly for the ratepayers.

⁷ SCE Jan. 8 Comm'ts at 5–6. ORA recommends that the Commission approve no transmission upgrade proposals, until CAISO has completed these new transmission planning and generator interconnection studies and the Commission has reviewed them.

⁸ Dec. 3 ALJ Rul'g at 2.

⁹ See e.g., Mojave Solar Jan. 8 Comm'ts at 3 and SCE Jan. 8 Comm'ts at 3 (no showing that NRG's permanent retirement of Coolwater GS would likely change in the near future).

Further, according to the Application, one of the CLTP's purposes is to remedy the bottleneck in transmission between the Kramer and Lugo substations.¹⁰ However, the Coolwater GS closure will result in less demand of power transfer capability on the Kramer – Lugo transmission lines. The Coolwater GS has a total generating capacity of 636 megawatts (MW)¹¹; Mojave Solar, a maximum generating capacity of 275 MW.¹² Assuming both the Mojave Solar generation and the Coolwater GS had a 100% effectiveness factor of power transfer capability on the Kramer – Lugo transmission line, the Coolwater GS closure will result in 361 MW (difference between the 636 MW and the 275 MW) of additional power transfer capability that can be used by other generators, including renewables, in that area. Therefore the CLTP is not needed to address the transmission bottleneck described above.

3.3 Mojave Solar's interlocking contracts and agreements are irrelevant to the question of whether the Commission should proceed with the Amended Application and PEA review.

Mojave Solar wants the Commission to proceed with the Amended Application and PEA review, despite the shutdown of Coolwater GS for the following reasons:

Mojave Solar is committed by virtue of an interlocking series of contracts and agreements, to construct its plant and provide full deliverability using the planned CLTP upgrades. The LGIA . . . requires that the CLTP be built in order to ensure Mojave Solar can reach full deliverability. . . .¹³

This argument is irrelevant to the question of whether the Commission should go forward with this proceeding. First, as the Commission held in Resolution (Res.) E-4433, approval of a PPA does not obligate the Commission to approve the Amended Application and PEA in this matter.¹⁴

¹⁰ See Amended Appl. at 14.

¹¹ See Mojave Solar Jan. 8 Comm'ts at 3.

¹² Amended Appl. *supra* note 10.

¹³ See Mojave Solar Jan. 8 Comm'ts at 6.

¹⁴ PG&E, Res. E-4433 at 2 (dated Nov. 10, 2011).

As Res. E-4433 states:

Nothing in this resolution is meant to imply that the Commission has made a determination with regards to the merits of the Coolwater-Lugo project or SCE's larger South of Kramer transmission project.¹⁵

Second, as SCE noted, the CLTP was included in the base case for (i) the CAISO transmission planning studies since the 2010-2011 transmission planning process; and (ii) prior CAISO generator interconnection queue studies.¹⁶ These studies, as well as the LGIA,¹⁷ assumed the Coolwater GS was operating. But, with the retirement of the Coolwater GS, the transmission upgrades recommended by these prior studies and the LGIA cannot provide a reasonable basis for assessing the need for the CLTP.

Third, it is illogical to suggest that the Commission should approve the CLTP, when the Coolwater GS has shut down and no evidence is presented showing that NRG could obtain purchase agreements to trigger restarting or repowering it. Therefore, the Commission should reject Mojave Solar's argument.

4 CONCLUSION

For the reasons stated above, the Commission should dismiss without prejudice the Amended Application and PEA. The Coolwater GS closure removes any reason to continue this proceeding. Both SCE and Mojave Solar speculate that that NRG will restart or repower Coolwater GS. However, this does not justify committing any more resources and energies by the Commission, its Staff, or other parties to this matter. SCE and Mojave Solar can resubmit their application if and when NRG restarts or repowers, or after CAISO has completed new transmission planning and generator interconnection studies in the absence of Coolwater GS.

¹⁵ *Id.* at 15.

¹⁶ SCE Jan. 8 Comm'ts at 5-6.

¹⁷ The LGIA relied on the CAISO Interconnection Facilities Study dated November 20, 2009. *See* LGIA, append. A, at 91 (available on file from ORA).

Respectfully submitted,

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January 22, 2015