BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements. R.16-02-007

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ADMINISTRATIVE LAW JUDGE’S RULING SEEKING COMMENT ON PROPOSED PREFERRED SYSTEM PORTFOLIO AND TRANSMISSION PLANNING PROCESS RECOMMENDATIONS

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Order Instituting Rulemaking to Develop an Electricit y  Integrated  Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements. 

R.16-02-007

O N  P R O P O S E D  P R E F E R R E D  S Y S T E M  P O R T F O L I O  A N D 
T R A N S M I S S I O N  P L A N N I N G  P R O C E S S  R E C O M M E N D A T I O N S 

Pursuant to the Administrative Law Judge’s Ruling Seeking Comment on Proposed Preferred System Portfolio and Transmission Planning Process Recommendations, dated January 11, 2019 (“Ruling”), Southern California Edison Company (“SCE”) hereby submits these reply comments to the California Public Utilities Commission (“Commission” or “CPUC”).†

I. INTRODUCTION

There are serious concerns with Staff’s recommendation that the Commission adopt the Hybrid Conforming Portfolio (“HCP”) as the basis for the 2017-2018 Integrated Resource Planning (“IRP”) cycle’s Preferred System Plan (“PSP”). Most significantly, the HCP does not meet the fundamental constraint of the IRP process – the 2030 electric sector greenhouse gas (“GHG”) emissions planning target established by the Commission in Decision (“D.”) 18-02-018. In addition, the HCP may not ensure reliability and could result in higher costs than alternative portfolios. For these and other reasons, numerous parties oppose approval of the HCP as the PSP. Moreover, even among the parties that support adoption of the HCP, many argue that it should not be used to order procurement or take policy actions. Other parties also share SCE’s concern that the Commission could undermine the IRP process by setting a precedent that it will approve a PSP that does not meet the GHG emissions targets or other IRP goals set forth in Senate Bill (“SB”) 350.

Given the deficiencies in the HCP, SCE recommends that the Commission adopt the Reference System Portfolio (“RSP”) with 2017 Integrated Energy Policy Report (“IEPR”) inputs as the PSP. If the Commission does adopt the HCP as the PSP, it should state that the HCP will not be used as the baseline for the 2019-2020 IRP process and that it is not setting precedent for how load-serving entity (“LSE”) IRPs will be aggregated into a PSP in future cycles. The Commission should also work towards an IRP process that will take LSE preferences into account in development of the PSP while still ensuring that state goals, such as GHG emissions targets, are satisfied. Regardless of the PSP that is adopted, the Commission should make clear that the 2017-2018 IRP cycle was a “dry run” that will not result in any procurement requirements or policy actions. Additionally, the Commission should adopt Staff’s recommendation that two scenarios based on 2030 statewide electric sector GHG emissions of

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32 million metric tons ("MMT") (i.e., Cases B and C) be transmitted to the CAISO to be studied as policy-driven sensitivity cases in the 2019-2020 Transmission Planning Process ("TPP").

In order to improve the Commission’s assessment of reliability in future IRP cycles, the Commission should also establish a formal role for the CAISO in the IRP process and increase transparency surrounding Staff’s modeling results.

Lastly, the Commission should not make determinations that have no basis in fact or the record of this proceeding. Specifically, the Commission should reject the Joint CCAs’ request that it pre-determine that future PSPs will include investor-owned utility ("IOU") conforming portfolios and community choice aggregator ("CCA") preferred portfolios, as well as the proposed findings regarding the HCP and CCAs’ individual IRPs that are not supported by the record.

II.

There is significant consensus among the parties that the HCP should not be used as the basis for procurement or policy actions. Many parties agree with SCE that the HCP should not be adopted as the PSP, because the HCP does not achieve the 34 MMT CAISO system share of the 2030 electric sector GHG emissions planning target of 42 MMT established by the Commission in D.18-02-018, because the HCP may not ensure reliability, because the HCP may be higher cost than other alternatives, because the HCP does not meet the 60% by 2030 Renewables Portfolio Standard ("RPS") goal, and/or for other reasons.\(^2\)

\(^2\) See Cal Advocates Comments at 1-2, 5-11, 12-15; CEDC Comments at 3-4; CEERT Comments at 2-4; CEJA/Sierra Club Comments at 1, 5-6; EDF Comments at 1-4; GPI Comments at 5; HKG Comments at 2-3; IID Comments at 2-4; Joint Parties Comments at 3-4; L. Jan Reid Comments at 2; Nevada Hydro Comments at 2-3; TURN Comments at 1-2, Attachment A at 1.
For example, TURN states that the Commission should not adopt the HCP as its PSP because “[t]he HCP falls too short of the Commission’s own GHG reduction goals to warrant being called a ‘preferred’ plan” and “also falls short of the requirement that renewable resources constitute 60 percent of retail sales by 2030.”³ Cal Advocates recommends against the Commission adopting the HCP as the PSP, reasoning that “[a]pproving a PSP that fails to achieve the state’s electric sector GHG emission target and may increase ratepayer costs is not consistent with the state’s SB 350 goals.”⁴ Similarly, CEJA and Sierra Club urge the Commission not to approve the HCP as the PCP because it fails to meet SB 350 GHG and RPS targets.⁵

For all of these reasons, the Commission should not adopt the HCP as the 2017-2018 PSP. The Joint CCAs argue that, according to RESOLVE, “the HCP would reduce GHG emissions in the CAISO footprint to 34 MMT in 2030.”⁶ That is incorrect. As Cal Advocates states, Staff’s own production cost modeling found that the HCP results in 42.7 MMT of GHG emissions in the CAISO region, 8.7 MMT more than the 34 MMT target, and Staff’s analysis of the HCP in RESOLVE resulted in 37.5 MMT of GHG emissions for the CAISO region, 3.5 MMT more than the 34 MMT target.⁷ Thus, under either production cost modeling in SERVM or capacity expansion modeling in RESOLVE, the HCP does not meet the established GHG emissions target.

The Joint CCAs also claim that RESOLVE should be the primary model used to assess GHG emissions and while SERVM’s GHG emissions results may provide a helpful “second opinion,” they should not be relied upon as the primary measure of emissions.⁸ It is important to consider all modeling results when assessing a portfolio. In the IRP process, different modeling

³ TURN Comments at Attachment A at 1.
⁴ Cal Advocates Comments at 5, 10.
⁵ See CEJA/Sierra Club Comments at 1.
⁶ Joint CCAs Comments at 2.
⁷ See Cal Advocates Comments at 7.
⁸ See Joint CCAs Comments at 15.
tools, based on the specific requirements of each process step, should be applied in developing, analyzing, and validating resource portfolios. In the first step, the capacity expansion tool is utilized to build the least cost resource portfolio to satisfy GHG and RPS constraints. After the resource portfolio is determined, the production cost model, considering more detailed generator characteristics and transmission constraints, is used to evaluate the operational performance, reliability, and GHG emissions of this portfolio. If assessed using an iterative process to properly align each model’s results, different modeling tools can each provide valuable insight into a given portfolio. However, production cost modeling must be appropriately calibrated to the capacity expansion modeling outcomes and assumptions.

Staff simulated the RSP using SERVM and reported higher GHG emissions in the CAISO system than reported by the RESOLVE modeling results. The divergence of GHG emissions reported by SERVM and RESOLVE was mainly caused by the misalignment between the two models. It is not appropriate to simply discard the SERVM results due to the result inconsistency, as suggested by the Joint CCAs. Instead, more effort should be made to calibrate SERVM and RESOLVE to gain meaningful insights from the SERVM results. RESOLVE should not be the primary tool to count GHG emissions given its oversimplified assumptions. Moreover, as noted above, even using RESOLVE, the HCP’s GHG emissions exceed the GHG emissions target.

SCE recommends that the Commission adopt the RSP with 2017 IEPR inputs instead of the HCP. While SCE agrees that LSE preferences should be taken into account in the IRP process, the Commission should not adopt a PSP based on aggregated LSE portfolios at the expense of achieving GHG emissions targets, maintaining reliability, or satisfying other IRP goals. The RSP does a better job of meeting these goals than the HCP.

There is other stakeholder support for approval of the RSP. If the Commission decides that it needs to adopt a PSP, Cal Advocates suggests adopting the RSP with 2017 IEPR adjustments, as well as gas retirements, as the statewide portfolio that would most likely meet the
state’s electric sector GHG emissions target.\textsuperscript{9} If improvements cannot be made to the HCP, IID also supports the RSP based on the 2017 IEPR.\textsuperscript{10} CEJA and Sierra Club request that the Commission approve the RSP as an “interim plan while another plan is being developed in the next cycle, because the RSP better reflects the procurement necessary to meet GHG and RPS requirements.”\textsuperscript{11} Moreover, L. Jan Reid recommends the Commission utilize the 42 MMT portfolio adopted in D.18-02-018.\textsuperscript{12}

If the Commission does adopt the HCP as the basis for the PCP, the Commission should make clear that the 2017-2018 IRP cycle was a “dry run” that will not be used to authorize any procurement requirements, investment, or policy actions and will not serve as a precedent for how LSE IRPs will be aggregated into a PSP in future IRP cycles. The Commission should also find that the HCP will not be the baseline for the next IRP process.

Even parties that do not oppose adoption of the HCP as the PSP caution against using it to require procurement and/or take policy actions. For instance, the CAISO states that its modeling indicates that the HCP may result in reliability issues and that, given the uncertainties resulting from the differences in the CAISO’s and Staff’s modeling and the significant modeling improvements recommended for the next IRP cycle, the Commission should not use the HCP as the basis for procurement.\textsuperscript{13} AReM argues that the HCP is acceptable in the short-term for the 2017-2018 PSP, but “is not appropriate for long-term applicability or as the basis for directing procurement or policy actions in this IRP cycle.”\textsuperscript{14} Similarly, other parties support adoption of the HCP as the PSP, but oppose ordering any procurement and/or policy actions.\textsuperscript{15} Several

\textsuperscript{9} See Cal Advocates Comments at 10-11.
\textsuperscript{10} See IID Comments at 4.
\textsuperscript{11} CEJA/Sierra Club Comments at 1.
\textsuperscript{12} See L. Jan Reid Comments at 3.
\textsuperscript{13} See CAISO Comments at 6, 8, 14-16.
\textsuperscript{14} AReM Comments at 8-9. See also id. at 1-2, 7-8.
\textsuperscript{15} See Joint CCAs Comments at 1-6, 21; NRG Comments at 5; PG&E Comments at 2-3, 20-23; SDG&E Comments at 2, 18.
parties suggest that the 2017-2018 IRP cycle should be considered a “proof-of-concept run only,” a rough “trial run,” a “practice round,” a “proof-of-concept” cycle, or a “dry run.”

Indeed, regardless of what portfolio is adopted as the PSP, SCE does not believe that portfolio should be used to mandate procurement or adopt policy actions. SCE agrees with Cal Advocates that the Commission “should not order any resource procurement at this time because there is an insufficient record to support guidance for resource procurement.” The HCP does not meet the Commission’s established GHG emissions target, may not ensure reliability is maintained, and may not minimize costs. Additionally, it is uncertain whether the RSP meets the GHG emissions target for this IRP cycle and the next IRP cycle is likely to result in a very different 2030 electric sector GHG emissions planning target, different electrification assumptions, and a different optimization as distributed energy resources are more fully integrated into the modeling. Accordingly, instead of taking procurement or policy actions based on the adopted PSP, the Commission should focus on developing a deep decarbonization, high electrification alternative base case and a process for taking into account LSE preferences while also ensuring state goals are met for the next IRP cycle.

It is also critical that the Commission avoid setting a precedent that LSE preferences will be elevated above the need for a truly optimized system-wide plan that achieves the Commission-determined GHG emissions planning target. TURN notes that the “Commission should not label the HCP as its ‘preferred’ plan – such a finding would undercut the credibility of the IRP process.” Should the Commission wish to adopt the HCP as the PSP, TURN recommends that “it must at least formally acknowledge that the HCP/PSP has fallen short of both the Commission’s GHG reduction goals and new RPS procurement requirements,” and that “[t]his fact justifies a more robust commitment to developing an effective PSP in the 2019-20

\[16\] GPI Comments at 3; Joint CCAs Comments at 2; Ormat Comments at 3; PG&E Comments at 3; SDG&E Comments at 2.
\[17\] Cal Advocates Comments at 30.
\[18\] TURN Comments at 1-2 (emphasis in original).
IRP process.” Likewise, UCS states that the “Commission should not set a precedent of approving a PSP that fails to adequately reduce GHG emissions without signaling their intention to address such deficiencies in future IRP cycles.” SCE agrees with these concerns.

Finally, because SCE recommends adopting the RSP as the PSP, SCE also supports transmitting the RSP to the CAISO as the reliability and policy-driven base case to be studied in the 2019-2020 TPP. Other parties agree that the RSP should be the reliability and/or policy-driven base case. Some parties suggest that Case B and/or Case C would better represent reliability and/or policy-driven base cases than the HCP. SCE strongly supports Staff’s proposal to transmit Cases B and C to the CAISO to be studied as policy-driven sensitivity cases, and also supports the Commission developing a 32 MMT deep decarbonization, high electrification alternative base case for the 2019-2020 IRP cycle.

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10 Id. at 2.
20 UCS Comments at 5.
21 See CEERT Comments at 7 (RSP should be the reliability base case); CEJA/Sierra Club Comments at 7-8, 18 (RSP based on 2017 IEPR data should be the reliability base case); L. Jan Reid Comments at 9-10 (42 MMT portfolio adopted in D.18-02-018 should be the reliability and policy-driven base case).
22 See AWEA-California Comments at 4-11 (suggesting Case C be the policy-driven base case); CEERT Comments at 7-8 (recommending Case C be the policy-driven base case); CEJA/Sierra Club Comments at 18 (proposing that a 32 MMT case be the policy-driven base case);CESA Comments at 11-12 (suggesting Cases B and C be used for policy-driven base case and Case B be reliability base case); HKG Comments at 6 (recommending Case B or C be the policy-driven base case); Joint Parties Comments at 4, 9 (one of the 32 MMT portfolios should be policy-driven base case); POC Comments at 22-23 (supporting Case B as policy-driven base case).
23 Among the parties who commented on the issue, there was significant support for transmitting Cases B and/or C to the CAISO to be studied as policy-driven sensitivity cases in the 2019-2020 TPP. See CAISO Comments at 13-14; Cal Advocates Comments at 11, 30; Calpine Comments at 9; CEJA/Sierra Club Comments at 19; CESA Comments at 12; GPI Comments at 19-20; Joint Parties Comments at 10; L. Jan Reid Comments at 11; SDG&E Comments at 17; TURN Comments at 3, Attachment A at 11.
III.

THE COMMISSION CAN IMPROVE ASSESSMENT OF RELIABILITY IN FUTURE CYCLES BY FORMALIZING CAISO’S ROLE AND IMPROVING TRANSPARENCY

Several parties made comments regarding the need for enhanced reliability modeling in subsequent IRP cycles, both in the Commission’s own capacity expansion and production cost modeling methods, and its alignment with the CAISO’s modeling.24 SCE agrees that the Commission can improve its consideration of reliability issues in future cycles, especially in the context of understanding effects of potential gas retirements. While additional stakeholder input is required on more detailed modeling improvements that may be appropriate and feasible, SCE highlights two suggestions made in party comments that should be implemented as soon as possible.

First, the IRP process should include a formal role for the CAISO, early in the process. SDG&E suggests “it would be beneficial for the CAISO to be engaged in preliminary analysis in the next IRP round to assess reliability of the [RSP], including assessment of local reliability, before the conforming plan is developed.”25 Similarly, Cal Advocates proposes that Staff “work closely with the CAISO to examine reliability constraints in local areas and sub-areas to guide targeted resource retirement and alternative resource development, and to consider intra-hour reliability needs.”26 SCE agrees with these suggestions, and recommends that the CAISO’s role be formalized in the IRP process.

This is not a new concept. In the early stages of IRP process development, Staff proposed a conceptual framework for interagency coordination and checkpoints shown in Figure

24 See Cal Advocates Comments at 2-3, 14-15 (discussing the need for collaboration with CAISO to examine local and sub-area and intra-hour reliability, and potential gas retirements); Calpine Comments at 3-4 (discussing local reliability analysis); CESA Comments at 7, 9 (discussing economic gas retirements modeling and intra-hour ramping needs); PG&E Comments at 2, 5-7 (discussing the need for robust local capacity resource analysis).
25 SDG&E Comments at 5.
26 Cal Advocates Comments at 14.
1 below. In this framework, system and local reliability needs were to be evaluated after developing assumptions and before RSP development. In line with the former Long-term Procurement Planning processes, the CAISO was to be involved in this early-cycle step, in addition to its role in RSP development and TPP study of the RSP.27

Figure 1

The Commission should include the interactions between the IRP and the CAISO processes as a formal part of the IRP process. Waiting until individual LSE plans were developed and aggregated into the HCP to allow for substantive CAISO participation does not contribute to an effective IRP process where system and local needs can be adequately addressed. The need for this formalized participation, earlier in the IRP process, has become clear throughout this 2017-2018 “dry run” IRP cycle. The CAISO should identify system and

local needs early in the process, before the RSP is developed. Additionally, model misalignment and divergent outcomes on the HCP analysis may have been mitigated with additional collaboration between Staff and the CAISO. Therefore, SCE encourages the Commission to adopt a formal role for the CAISO in subsequent IRP cycles, both before the RSP is developed and throughout the remainder of the process.

Second, to better understand any differences between Staff and party modeling results, in particular ones as substantive as those that emerged in the 2017-2018 cycle, additional transparency is needed. As the CAISO notes, “[f]or the CAISO and parties to understand fully why these modeling results diverge and to more fully study the reliability of the hybrid conforming portfolio, the Commission should release Energy Division staff’s detailed hourly SERVM modeling results, rather than averages, and related detailed modeling inputs and outputs. The Commission has requested modeling parties to provide this level of detail in this proceeding and the same transparency standard should apply to Energy Division’s staff’s modeling.”28 SCE agrees. Lack of information regarding Staff’s modeling results has inhibited parties’ ability to assess reliability analysis and understand differences between Staff and party modeling. In future IRP cycles, SCE urges Staff to provide its production cost modeling inputs and outputs, including detailed assumptions, so that parties can perform independent assessments of the proposed PSP.

IV.

THE COMMISSION SHOULD NOT MAKE DETERMINATIONS THAT HAVE NO BASIS IN FACT OR THE RECORD OF THIS PROCEEDING

As the Commission proceeds toward issuing a Proposed Decision for the 2017-2018 IRP cycle, SCE is concerned that certain parties have asked the Commission to make determinations on process, or findings regarding filed plans, that have no basis in fact or the record of this proceeding.

28 CAISO Comments at 8.
proceeding. In particular, the Joint CCAs ask the Commission to pre-determine the selection of LSE plans for future PSPs and make findings regarding individual CCA plans that should be rejected.

As a threshold matter, SCE reiterates that it is essential for all LSEs to be equal participants in the IRP process, subject to the Commission’s statutory authority over the IRP process. This is not only a matter of fairness, but also to ensure the PSP ultimately adopted by the Commission is optimized appropriately. As CCAs collectively serve larger portions of CAISO system load, their full and robust participation in the IRP process will be essential to ensuring that the state achieves its decarbonization, affordability, and reliability goals. Simply aggregating individual plans that reflect certain LSE preferences is not sufficient to ensure the creation of a system-wide optimized plan that achieves the objectives of SB 350.

The Joint CCAs claim that the Commission should view the differences between the RSP and HCP “as improvements to the RSP” because the HCP reflects “resource choices informed by individual LSEs’ far more intimate and detailed knowledge of their operations, plans, and the specific needs of the communities and customers they serve.” The Joint CCAs argue that “[f]urther improvements along these lines can be achieved in future IRP cycles using an HCP consisting of IOU conforming portfolios and CCA programs’ preferred portfolios.” As discussed above, while SCE agrees that LSEs’ preferences and specific knowledge of their operations and customers should be considered in the IRP process, LSE preferences cannot come at the expense of an optimized system-wide plan that meets GHG emissions targets and other state goals. The HCP is not an improvement on the RSP when it does not satisfy the GHG emissions target established by the Commission and may be less reliable and more costly than the RSP.

29 Joint CCAs Comments at 14 (emphasis in original).
30 Id.
Furthermore, the Commission should reject the Joint CCAs’ attempt to pre-determine that future PSPs will consist of IOU conforming portfolios and CCA preferred portfolios. As the HCP has shown, there is no reason to presuppose that CCA plans will be able to be aggregated into a system-wide plan that is operable and meets state policy goals. There is also no record to support an assertion that, if the Commission had chosen CCA preferred portfolios for aggregation, the overall system would achieve GHG emissions, reliability, or other goals.

Moreover, there is no reason to dismiss out of hand any preferred portfolio an IOU may propose. Both SCE and PG&E put forward preferred portfolios in their 2017-2018 IRPs and IOUs should have the freedom to develop and propose such plans again in future cycles. Both conforming and preferred plans put forward by any LSE should be subject to individual review and selection by the Commission for inclusion into a PSP that achieves state decarbonization, reliability, and affordability goals.

Finally, the Joint CCAs request that the Commission “explicitly find that each CCA program’s IRP adequately contributes to a statewide portfolio that achieves the goals of Senate Bill 350,” and “find that the HCP as a whole, and in particular new procurement planned by CCA programs, satisfies the State’s renewables integration resource need and each CCA programs’ individual share of that need.” The Commission does not have sufficient basis in the record to make either of these findings.

First, the HCP does not adequately achieve SB 350 goals. The HCP does not meet the most important requirement of the IRP process – compliance with the CAISO system share of the 42 MMT 2030 electric sector GHG emissions planning target established by the Commission in D.18-02-018. This in itself suggests that the level of procurement proposed in the HCP does not adequately integrate renewables, potential reliability constraints aside, to achieve the appropriate GHG emissions target. Before making an assessment on renewable integration sufficiency, the Commission would have had to run the HCP back through RESOLVE to identify

\[\text{Id. at 20.}\]
additional capacity expansion required to achieve the GHG emissions target. Only then would an assessment of other renewable integration factors, such as ramping needs or ancillary services, be meaningful. The Joint CCAs’ request does not acknowledge these issues.

GHG target non-compliance notwithstanding, there are other reasons to be concerned that the HCP, as a reflection of primarily CCA-planned additions, does not constitute an adequately diverse or reliable portfolio. IEP notes that the CCAs plan to develop approximately 9,500 megawatts (“MW”) of new intermittent renewable resources, alongside 1,000 MW of battery storage, and that total new planned capacity additions are approximately 11,000 MW by 2030. IEP raises concerns regarding renewable integration, stating that “[i]t remains unclear whether the planned 11:1 ratio between new intermittent resources and new battery-storage will be enough to maintain grid reliability, particularly in an era when existing capacity (primarily thermal) is at risk of retirement.” SCE’s analysis also showed that the HCP resulted in higher ramping rates and net loads than the RSP, indicating that the proposed portfolio results in higher dependencies on system power to integrate renewables on the grid. The Commission’s reliability analysis acknowledges that some hours in 2030 experienced loss of non-spinning reserves, and the CAISO’s reliability analysis resulted in both overall resource insufficiency and loss of reserves. As such, the HCP has not been shown to appropriately integrate renewables. The Commission has also not established a method to determine how to assess any individual LSE’s portfolio for satisfactory renewable integration.

Given these unresolved concerns, there is not yet sufficient record in this proceeding to indicate that each CCA plan adequately contributes to an acceptable statewide portfolio or includes sufficient renewable integration. Therefore, the Commission should not make a specific

32 See IEP Comments at 3.
33 Id. at 4.
34 See SCE Comments at Appendix A at 3, 10-11.
35 See Ruling, Attachment A at 70; CAISO, Reliability Assessment of the IRP Hybrid Conforming Plan, January 7, 2019, at 18.
finding affirming the Joint CCAs’ requests, unless and until it is clear from the record of this proceeding that the PSP and each LSE plan achieves these levels.

V.

CONCLUSION

For all the foregoing reasons, the Commission should adopt SCE’s recommendations discussed in SCE’s opening comments and herein.

Respectfully submitted,

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