

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

In the Matter of the Application of Pacific Gas and Electric Company (U 39 E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the Jefferson-Martin 230 kV Transmission Project.

Application 02-09-043  
(Filed September 30, 2002)

**WOMEN'S ENERGY MATTERS' REPLY BRIEF  
ON THE JEFFERSON-MARTIN TRANSMISSION PROJECT**

March 17, 2004

Barbara George, Executive Director  
Women's Energy Matters  
P.O. Box 162008  
Sacramento CA 95816-9998  
Phone: 916-739-1898 [wem@igc.org](mailto:wem@igc.org)

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

In the Matter of the Application of Pacific Gas and Electric Company (U 39 E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the Jefferson-Martin 230 kV Transmission Project.

Application 02-09-043  
(Filed September 30, 2002)

**WOMEN'S ENERGY MATTERS' REPLY BRIEF  
ON THE JEFFERSON-MARTIN TRANSMISSION PROJECT**

Women's Energy Matters appreciates this opportunity to make this reply comment.

We note that none of the other parties' opening briefs address reduced load-serving capability although the San Francisco PUC has issued a statement since close of hearings, indicating that it is of grave concern. We believe this belies the following statement:

The Load Serving Capability of the Project Area has been Extensively Studied and Clearly Demonstrates the Need for the Project

The power flow analyses for 2006, assuming that HPPP is retired and no new significant local generation is added, and assuming any of the three demand forecasts, show that overloads will occur if the Jefferson-Martin Project is not online before then. (CCSF Opening Brief, p. 5)

On the contrary, Power flow analyses show that J-M will reduce LSC, by increasing overloads rather than reducing them. Perhaps the overloads are not real – maybe they result from ISO's generic method of estimating loads by cranking up load proportionately on all substations. If this is the problem, then it needs to be fully addressed. Either the proceeding should validate ISO's methods and take the LSC reduction seriously, or make it clear that their LSC methods should be changed, and new LSC studies should be performed based on the new methods. Until that is done, there is no justification for the Jefferson-Martin line.

ISO hid behind PG&E's separate analysis. However even PG&E's analysis justifying the line did not consider the whole project area, only the San Mateo to Martin corridor.

PG&E has not addressed the differences between their methods and ISO's methods – but neither is complete. A new analysis should be done based on whatever methods will rule the system. The CPUC can't have it both ways. ISO uses its own methods to show reliability problems, but uses PG&E's methods to show that J-M would solve those problems. And PG&E's methods didn't really show that the problems were solved, because they didn't address the full project area.

Another problem is that there is also no agreement between PG&E and ISO on the project area. PG&E based its application and PEA on the original project area and for whatever reason decided not to update its figures to address ISO's new definition. Therefore we're dealing with at least two definitions – PG&E/ISO's original definition, ISO's new definition (and the third definition, used for the study within a study – which only looked at the San Mateo to Martin corridor).

No parties have made a showing that the Project is not needed. (CCSF p. 1)

WEM has shown the Project is not needed. Whether or not CCSF agrees with WEM's showing, it is arrogant and insulting for them to claim we have not made it.

The Commission should approve the Project on the schedule proposed by PG&E because it is needed for reliability and it makes economic sense. (CCSF p. 2)

It only makes economic sense for power generators who want to use this line to export power. From the point of view of a power generator it may make sense for all PG&E ratepayers to subsidize this project no matter what the cost, but CCSF is not representing San Francisco ratepayers here.

II. The Project Has Been Extensively Studied as the Best Viable Solution to Provide Electric Reliability to the Upper San Francisco Peninsula  
The addition of a 230 kV transmission project to the City of San Francisco and Northern San Mateo County communities was extensively studied over a 15-month period by a stakeholder group convened by the California Independent System Operator (CAISO). (CCSF p. 2)

The project was “extensively studied” but not THOROUGHLY studied:

A) Proponents hid or downplayed some important information, e.g. 1) actual capabilities of the corridor; 2) import capability of 115 kV lines into San Mateo ; 3) relevance of HZ lines, the 230 kV lines from Martin to Embarcadero (they were hidden because of

PG&E's traditional assumptions of L-2 rather than ISO's assumption, L-1); 3) potential for EE local renewables and DG were not adequately explored (comments of SAEJ) (much more PGC-funded EE could be sited in the project area); 4) the cost of the J-M line was low-balled, giving it an unfair edge over other, potentially less expensive options; 5) QFs in the Greater Bay Area were not counted, 6) municipal power plants and transmission lines may not have been included in ISO (or PG&E) LSC numbers, 7) the possibility that the loss of all overhead lines or the entire 115kV part of the substation was a farfetched criteria, and is not applied anywhere else in the state.

B) There has been new developments since 2000, e.g. 1) new power plants have been built (but are still not included in import capability); 2) transmission upgrades, e.g. line #4 is being added, San Mateo to Martin lines have been reconductored, Tesla bundling is underway – none were included in the LSC 2003 study; 3) the forecast has dramatically decreased; 4) potential for vast amounts of procurement-funded energy efficiency by utilities; 5) potential for much greater PGC-funded EE by non-utilities, who make much better use of the funds because they don't have a conflict of interest, while PG&E does; 5) Community Choice aggregation, which the City is pursuing, gives the City much greater control over future EE and much greater opportunity for cost-effective EE because it would eliminate PG&E's conflict of interest; 5) precarious supplies of natural gas mean that relying on gas-based system reduces reliability and increases expense.

C) ISO is shifting RMRs for several plants that use to be RMR'd to supply power for GBA – sending power elsewhere that used to be considered mandatory for the Bay Area must mean that the situation is not as bad here as they have claimed. This would tend to refute the need for the project.

Each [HPPP and Potrero] has been kept in operation only to maintain local reliability through FERC-approved "Reliability Must-Run" (RMR) contracts with the California Independent System Operator (CAISO), which result in California ratepayers paying both the fixed costs of keeping the plants in operation and their variable costs of producing energy. (Ex. 4 at 3/PG&E witness Yeung) (CCSF p. 3)

PG&E may argue that they only run HPPP because of the RMR contracts. But there has been no showing in this proceeding that Mirant runs Potrero only because of the RMR.

The purpose of siting the CCSF turbines is to improve reliability and allow for the shutdown of all of the Hunters Point Power Plant (Units 1 and 4), thereby eliminating a large source of pollution to people in the southeast portion of San Francisco. (CCSF. P. 7)

It is disingenuous for CCSF to argue that the turbines eliminate a large source when in fact they add another large source, and there is no certainty that HPPP or Potrero will shut down. They have submitted no testimony in this proceeding about the amount of pollution that the CTs would cause, but CCSF did testify that they plan to operate longer hours than they are admitting to the community. This would increase pollution.

DATE: March 17, 2004

Respectfully submitted,  
WOMEN'S ENERGY MATTERS

---

Barbara George, Executive Director  
Women's Energy Matters  
P.O. Box 162008  
Sacramento CA 95816-9998  
Phone: 916-739-1898 [wem@igc.org](mailto:wem@igc.org)

**CERTIFICATION OF SERVICE  
A. 02-09-043**

I, Barbara George, certify that on this day March 17, 2004, I caused copies of the attached "WOMEN'S ENERGY MATTERS' REPLY BRIEF ON THE JEFFERSON-MARTIN TRANSMISSION PROJECT" to be served on all parties by emailing a copy to all parties identified on the service list provided by the California Public Utilities Commission for this proceeding, and also by delivering an original and six copies to the Docket office and a copy to Administrative Law Judge Charlotte E. TerKeurst and Presiding Commissioner Loretta Lynch.

Dated: March 17, 2004 at Sacramento, California.

---

DECLARANT

(Service List attached to original only)

A0209043 Email Service List:

"TerKeurst, Charlotte" <CFT@cpuc.ca.gov>,"mhudak@cmithlaw.com"  
<mhudak@cmithlaw.com>,"mdebry@hillsca.org" <mdebry@hillsca.org>,  
"sgustavson@dalcycity.org" <sgustavson@dalcycity.org>,  
"mraftery@co.sanmateo.ca.us" <mraftery@co.sanmateo.ca.us>,  
"lathompson@co.sanmateo.ca.us" <lathompson@co.sanmateo.ca.us>,  
"pthompson@ci.sanbruno.ca.us" <pthompson@ci.sanbruno.ca.us>,"ross-  
ndv@pacbell.net" <ross-ndv@pacbell.net>,"Peleo, Marion"  
<map@cpuc.ca.gov>,"joe.como@sfgov.org" <joe.como@sfgov.org>,  
"jcassman@hansonbridgett.com" <jcassman@hansonbridgett.com>,  
"peterweiner@paulhastings.com" <peterweiner@paulhastings.com>,  
"zacharywalton@paulhastings.com" <zacharywalton@paulhastings.com>,  
"jarmstrong@gmssr.com" <jarmstrong@gmssr.com>,"louis.leonard@lw.com"  
<louis.leonard@lw.com>,"mday@gmssr.com" <mday@gmssr.com>,  
"richard.raushenbush@lw.com" <richard.raushenbush@lw.com>,  
"edwardoneill@dwt.com" <edwardoneill@dwt.com>,"jkarp@whitecase.com"  
<jkarp@whitecase.com>,"dtk5@pge.com" <dtk5@pge.com>,  
"l\_brown123@yahoo.com" <l\_brown123@yahoo.com>,"phanschen@mofocom"  
<phanschen@mofocom>,"pcw@meyersnave.com"  
<pcw@meyersnave.com>,"svolker@volkerlaw.com" <svolker@volkerlaw.com>,  
"michaelboyd@sbcglobal.net" <michaelboyd@sbcglobal.net>,  
"grosenblum@caiso.com" <grosenblum@caiso.com>,"bgwem@igc.org"  
<bgwem@igc.org>,"michael@vmwp.com" <michael@vmwp.com>,  
"kjsimonsen@ems-ca.com" <kjsimonsen@ems-ca.com>,  
"bpowers@powersengineering.com" <bpowers@powersengineering.com>,  
"mturley@semprautilities.com" <mturley@semprautilities.com>,"

"dale@sflowercolors.com" <dale@sflowercolors.com>, "hbpease@yahoo.com"  
<hbpease@yahoo.com>, "jfccpa@sbcglobal.net" <jfccpa@sbcglobal.net>,  
"jnyberg@smindependent.com" <jnyberg@smindependent.com>,  
"LUrushima@FremontGroup.com" <LUrushima@FremontGroup.com>,  
"mmeloni@hillsca.org" <mmeloni@hillsca.org>, "netsakt@aol.com"  
<netsakt@aol.com>, "lennie@darwin.ptvy.ca.us" <lennie@darwin.ptvy.ca.us>,  
"mario715@earthlink.net" <mario715@earthlink.net>, "ross-ndv@pacbell.net"  
<ross-ndv@pacbell.net>, "mdjoseph@adamsbroadwell.com"  
<mdjoseph@adamsbroadwell.com>, "fosterbc@sce.com" <fosterbc@sce.com>,  
"scasey@sflower.org" <scasey@sflower.org>, "matthew@sfbg.com"  
<matthew@sfbg.com>, "Cem@newsdata.com" <Cem@newsdata.com>,  
"jeffgray@dwt.com" <jeffgray@dwt.com>, "sarah.esmaili@lw.com"  
<sarah.esmaili@lw.com>, "Victor.Cayanan@lw.com" <Victor.Cayanan@lw.com>,  
"lisaweinzimer@sbcglobal.net" <lisaweinzimer@sbcglobal.net>,  
"jonathan\_gervais@nps.gov" <jonathan\_gervais@nps.gov>,  
"frandacosta@att.net" <frandacosta@att.net>, "jwandrew@yahoo.com"  
<jwandrew@yahoo.com>, "clifpat@earthlink.net" <clifpat@earthlink.net>,  
"mnemschoff@earthlink.net" <mnemschoff@earthlink.net>,  
"brflynn@flynnrci.com" <brflynn@flynnrci.com>, "jonathan\_gervais@nps.gov"  
<jonathan\_gervais@nps.gov>, "swoodruff@meyersnave.com"  
<swoodruff@meyersnave.com>, "mrw@mrwassoc.com" <mrw@mrwassoc.com>,  
"lynn@lmaconsulting.com" <lynn@lmaconsulting.com>, "gumbrelli@cs.com"  
<gumbrelli@cs.com>, "puma@davis.com" <puma@davis.com>,  
"rmccann@umich.edu" <rmccann@umich.edu>, "cmkehrrein@ems-ca.com"  
<cmkehrrein@ems-ca.com>, "e-recipient@caiso.com" <e-recipient@caiso.com>,  
"gdeshazo@caiso.com" <gdeshazo@caiso.com>, "Stevens, Maria E."  
<MER@cpuc.ca.gov>, "Gatti, Belinda" <BEG@cpuc.ca.gov>, "Blanchard,  
Billie" <BCB@cpuc.ca.gov>, "TerKeurst, Charlotte" <CFT@cpuc.ca.gov>,  
"Burt, Harriett" <HJB@cpuc.ca.gov>, "Abhulimen, Joseph A."  
<JAA@cpuc.ca.gov>, "Lee, Kelly" <KCL@cpuc.ca.gov>, "Motamedi, Lainie"  
<LRM@cpuc.ca.gov>, "Logan, Scott" <SJL@cpuc.ca.gov>,  
"slee@aspenerg.com" <slee@aspenerg.com>, "claufenb@energy.state.ca.us"  
[claufenb@energy.state.ca.us](mailto:claufenb@energy.state.ca.us)