

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

In the Matter of the Application of SOUTHERN  
CALIFORNIA EDISON COMPANY (U 338-E)  
for a Certificate of Public Convenience and  
Necessity Concerning the Devers-Palo Verde  
No. 2 Transmission Line Project

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Application No. 05-04-015  
(Filed April 11, 2005)

**SUPPLEMENT TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)  
AMENDMENT TO PETITION FOR MODIFICATION OF DECISION NO. 07-01-040**

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Dated: [September 12, 2008](#)

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Pursuant to the July 17, 2008, Joint Ruling of Assigned Commissioner and Administrative Law Judge Directing Amendment of Petition for Modification (“Ruling”) in the above-referenced docket and the September 2, 2008 ruling by the Administrative Law Judge (“ALJ”),<sup>1</sup> Southern California Edison Company (“SCE”) respectfully submits this Supplement (“Supplement”) to SCE’s Amendment to Petition for Modification (“Petition”) of Decision No. (“D.”) 07-01-040 filed September 2, 2008 (“Amendment”). SCE filed the Amendment in response to the Ruling’s direction that SCE amend its Petition. This Supplement further demonstrates that it is in the public interest to allow SCE to initiate construction of the California portion of the Devers-Palo Verde No. 2 Transmission Line Project (“DPV2”).

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<sup>1</sup> On September 2, 2008, ALJ Timothy Sullivan granted SCE’s telephonic motion for a brief extension to provide certain comparison information as a Supplement to the Amendment to Petition for Modification by September 12, 2008. See SCE’s Amendment to Petition for Modification, filed September 2, 2008, Section V.B, p. 19.

## I.

### INTRODUCTION

On January 25, 2007, the Commission issued D.07-01-040, granting SCE a Certificate of Public Convenience and Necessity (“CPCN”) to construct DPV2. A brief procedural background is provided in Attachment A.

SCE filed its Petition seeking authorization to construct the California portion of DPV2 to facilitate SCE’s ability to interconnect potential generation sources (a significant portion of which are renewable) that have requested interconnection to the California Independent System Operator (“CAISO”) grid in the Blythe area. SCE believes that pursuing the construction of the California portion of DPV2 in advance of the full project is the best way to deliver power from generation in the Blythe area because it uses existing right-of-way, has been fully analyzed from an environmental perspective, and is a direct path to the southern California load center using SCE’s most efficient voltage class (500 kV) for long distance electric transmission.

SCE’s Amendment addressed the Ruling’s suggestion that SCE look at several different ways to demonstrate that pursuing the California portion of DPV2 is in the public interest.<sup>2</sup> This Supplement to the Amendment provides additional information, as requested by the Ruling, to provide “comparisons to the rates charged for comparable lines in California.”<sup>3</sup> This information demonstrates that construction of the California portion of DPV2 is in the public interest.<sup>4</sup>

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<sup>2</sup> Ruling, p. 10.

<sup>3</sup> Ruling, p. 10.

<sup>4</sup> Ruling, p. 2.

## II.

### TRANSMISSION RATE COMPARISON

#### **A. Comparisons Based Solely On Project Cost Alone Without Consideration Of Project Need, Scope, Or Configuration Could Be Misleading And May Be An Inappropriate Basis For Determining Whether A Project Is In The Public Interest.**

The Ruling states that SCE should provide an estimate of the projected transmission rates for the proposed DPV2 Project, as well as comparisons to rates charged for comparable lines in California:

“Additionally to assist us in our analysis of a California-only project, SCE shall provide an estimate of the projected transmission rates for such a line, as well as comparisons to the rates charged for comparable lines in California.”<sup>5</sup>

SCE’s Amendment provided an estimate of how much the currently-effective transmission revenue requirement (“TRR”) for SCE’s network transmission facilities would change with the addition of the California portion of DPV2 and explained that facility-specific transmission rates are not applicable to individual network transmission facilities.<sup>6</sup> This Supplement attempts to provide “...comparisons [of the costs of the California portion of DPV2] to the rates charged for comparable lines in California.” However, facility-specific transmission rates are similarly not comparable to other individual network transmission facilities. Moreover, comparisons of the estimated transmission project costs or the estimated TRR may not provide an adequate basis for comparing proposed transmission projects, and should not be the sole determinant of whether a proposed project is in the public interest.

Transmission projects can vary significantly from one another in terms of project need, rating, and scope. A transmission project may be proposed to capture economic benefits, to meet reliability standards, or to facilitate compliance with legislative mandates. The need for the project

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<sup>5</sup> Ruling, p. 10.

<sup>6</sup> See SCE’s Amendment, Section V.B, p. 19.

and the alternatives available will likely drive project cost and scope, and a simple comparison between project costs will not provide reasonable information as to whether a particular project is in the public interest. Moreover, other factors may further prevent meaningful comparisons between projects. For example, a project may require additional electrical equipment necessary to obtain the proposed path/project rating, or upgrades to other transmission facilities. It would be inappropriate to compare a project that did not require similar upgrades or additional equipment to a project that did. Transmission line projects of equal voltage and distance in different regions of the state are likely to vary considerably in cost due to voltage support considerations, terrain, transformation requirements, construction methods, underlying transmission system upgrades, property values, and environmental mitigation costs. However, any given project could represent a preferred course of action if no other project or route alternatives would meet the project need, and thus, a comparison of these projects' costs would not be meaningful given the significant difference in circumstances for each project.

Path Ratings on a network of high voltage transmission lines could require that a utility sponsor upgrades to transmission facilities on neighboring utility systems or the installation of large voltage support devices to meet reliability standards on the electric grid. Hence, a comparison between two projects based on stated path rating or import capability may not be accurate or may not represent the project's ultimate benefit to ratepayers.

Often, a significant portion of a project's scope and cost may be driven by the need to provide transformation between various voltage levels. For example, a substation serving various high voltage and lower voltage interconnections would cost considerably more than a switchyard interconnecting three or four transmission lines. A transmission collector system designed to interconnect renewable energy facilities would cost considerably more than an interconnection to a single large combined-cycle gas-fired generation unit of equal output, yet both would provide benefit to ratepayers. Most projects currently planned in California have significant scope elements and long-term strategic benefits beyond the traditional wires and towers investment and these scope elements do not lend themselves to meaningful comparisons. Many of the benefits that actually are

derived from a transmission project, involve value that was not directly anticipated during project permitting. An example of this is the Pacific Intertie, which in addition to its direct value of accessing and pooling power supplies between the Pacific Northwest and California also provided the backbone transmission system that allowed for the California Aqueduct system and the enhancement of the California Power Pool.<sup>7</sup>

**B. Comparison of DPV2 To Other Large High-Voltage Transmission Projects In California.**

Projects in California such as San Diego Gas & Electric’s Sunrise Powerlink Transmission Project, SCE’s Tehachapi Renewable Transmission Projects, and Los Angeles Department of Water & Power’s Green Path North Transmission Project might represent the most likely comparisons to SCE’s DPV2 Project; however, each of these projects vary in terms of need, scope, and rating type. As such, a comparison of overall project costs between these divergent projects would not be particularly meaningful, given that a simple cost-to-cost comparison does not account for the varying circumstances which affect the respective projects’ costs.

In accordance with the Ruling’s directive, SCE presents below cost statistics for several other high-voltage projects being considered in California based, in part, on public information for projects proposed by other entities. A “cost-per-mile” index is provided to compare the cost estimates of the various projects. The cost-per-mile comparison was limited to single-circuit 500 kV transmission lines to provide a consistent point of reference. For instance, Segment 1 of the TRTP 1-3 Transmission Line Project, Segment 8 of the TRTP 4-11 Transmission Line Project, were not included because these segments included double-circuit tower construction. The 230 kV transmission line segments of the Sunrise Powerlink Transmission Project similarly were not included. The 500 kV transmission line costs provided below exclude substation elements, right-of-

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<sup>7</sup> October 2003 CEC Assessment (Document 700-03-009), page 12, prepared by Consortium of Electric Reliability Technology Solutions titled “Planning for California’s Future Transmission Grid - Review of Transmission System Strategic Benefits, Planning Issues and Policy Recommendations.”

way acquisition, or road construction; the comparison is based on the cost of the towers and conductor for each project. Even so, the transmission line cost estimates vary due to terrain, aesthetics, accessibility, and construction complexity.

## **Cost Statistics of Selected High-Voltage Transmission Projects Under Consideration in California**

### **1. DPV2 Transmission Project – California Portion**

- a) Status: Received CPCN, seeking approval to begin construction of California portion
- b) Total Cost: \$523 Million<sup>8</sup>
- c) Path Rating: Assumes 1,200 MW
- d) 500 kV Single-Circuit Transmission Line Facilities statistics:
  - Devers to Valley No. 2 (41.6 miles)
  - Devers to California border (128 miles)
  - Length: 169.6 miles
  - Cost: \$239.2 Million
  - **Cost per mile: \$1.4 Million**

### **2. Tehachapi Renewable Transmission Project Segments 1-3**

- a) Status: Received CPCN, seeking Special Use Permit from Angeles National Forest, Construction has started in Segment 1
- b) Total Cost: \$745.9 Million<sup>9</sup>
- c) Import Capability: Assumes 700 MW
- d) 500 kV Single-Circuit Transmission Line Facilities statistics:
  - Antelope to Vincent (21 miles)
  - Antelope to Windhub (21.6 miles)
  - Length: 42.6 miles
  - Cost: \$118.6 Million
  - **Cost per mile: \$2.8 Million**

### **3. Tehachapi Renewable Transmission Project Segments 4-11**

- a) Status: Seeking CPCN and Angeles National Forest approval
- b) Total Cost: \$1,537.6 Million<sup>10</sup>

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<sup>8</sup> See SCE's Amendment, V.B, p. 19. Costs are in constant dollars and escalated from year 2005 to year 2008 using SCE's general escalation rate process, including Pensions and Benefits (P&B), Administrative and General (A&G), and excluding Allowance for Funds Used During Construction (AFUDC). Costs do not include final engineering.

<sup>9</sup> See SCE's Petition, dated April, 23 2008. Costs are year 2008 dollars, including P&B, A&G, and excluding AFUDC. Costs include Segment 9, 500 kV Substation Upgrades; see SCE's Petition, III.B. Table 6.

- c) Import Capability: Assumes 3,800 MW
- d) 500 kV Single-Circuit Transmission Line Facilities statistics:
  - Antelope to Whirlwind (14 miles)
  - Path 26 Loop In (2 miles)
  - Antelope to Vincent (18 miles)
  - Vincent to Duarte area (32 miles)
  - Whirlwind to Wind Hub (17 miles)
  - Gould area to Vincent (18.6 miles)
  - Length: 101.6 miles
  - Cost \$376.1 Million
  - **Cost per mile: \$3.7 Million**

#### 4. **Sunrise Powerlink Transmission Project (SDG&E)**

- a) Status: Approved by CAISO Board, CPCN pending
- b) Total Cost: \$1,209 Million<sup>11</sup>
- c) Path Rating: 1000 MW<sup>12</sup>
- d) 500 kV Single-Circuit Transmission Line Facilities statistics:
  - From Imperial Valley to a new substation in San Diego County (91 miles)
  - Cost \$162 Million<sup>13</sup>
  - **Cost per mile: \$1.8 Million**

#### 5. **Green Path North Transmission Project (LADWP)**

- a) Status: Conceptual Planning
- b) Total Cost: Costs vary between multiple alternatives and routes<sup>14</sup>
- c) Transfer capability: Between 1000 and 1600 MW
- d) 500 kV Single-Circuit Transmission Line Facilities statistics:<sup>15</sup>

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<sup>10</sup> See SCE's Ex Parte Communication with Commissioner Dian Grueneich dated May 23, 2008. TRTP 1-11 Summary of Estimate Increases Constant 2006\$ to Constant 2008\$ and TRTP 1-3 Total Estimate for 500 kV Operations. Costs = \$2694.4M (Total TRTP 1-11) - \$410.9M (AFUDC) - \$745.9M (TRTP 1-3) = \$1,537.6M. Costs exclude Segment 9 500 kV Substation Upgrades allocated to TRTP 1-3.

<sup>11</sup> See A.06-08-010 of San Diego Gas & Electric Company (U-902-E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project, Chapter 3 "Cost Estimates," Attachment 3-1, dated March 12, 2008. Costs provided in SDG&E's Attachment 3-1 were in 2007 constant dollars and include P&B, A&G, and exclude AFUDC. For the purposes of comparison only, SCE escalated the costs to year 2008 using SCE's general escalation process and these figures are not the work product of SDG&E.

<sup>12</sup> WECC Phase II path rating for Sunrise Powerlink Transmission Project

<sup>13</sup> See A.06-08-010 of San Diego Gas & Electric Company (U-902-E) for a CPCN for the Sunrise Powerlink Transmission Project, Chapter 3 "Cost Estimates," Attachment 3-1, dated March 12, 2008. Line item costs provided for the Desert Link portion of the Overhead Transmission component in SDG&E's Attachment 3-1 were in 2007 constant dollars and include P&B, A&G, and exclude contingency and AFUDC. For the purposes of comparison only, SCE added a project average contingency of 12.7% and escalated the costs to year 2008 using SCE's general escalation rate. These figures are not the work product of SDG&E.

<sup>14</sup> See <http://www.ladwp.com/ladwp/cms/ladwp008077.pdf>.

- From Coachella to Hesperia 120 mile route
  - Cost: \$251 Million
  - Cost Per Mile: \$2.1 Million
- From Coachella to Hesperia 278 mile route
  - Cost: \$583 Million
  - Cost Per Mile: \$2.1 Million

As described above, there are many factors that may impact the cost of transmission lines, most notably, geography and physical design features that can significantly impact overall project costs. Regardless of these factors, the above information demonstrates that transmission line costs of the California portion of DPV2 are lower than the costs of other large high-voltage transmission projects being considered in California.

### **III.**

#### **DPV2 PROJECT COSTS IN CALIFORNIA ARE REASONABLE FOR RATEPAYERS**

The overall project costs for DPV2 facilities in California are favorable when compared to other projects of similar size or complexity because the DPV2 Project facilities in California would – for the majority of the Project – be constructed on level ground, be located within existing rights-of-way, and use existing access roads. The DPV2 Midpoint Substation is currently proposed as a switchyard and would not include transformation costs, which is typically paid for by the project developers connecting to the Switchyard, and therefore the cost to interconnect renewable generation in the Blythe area in California is relatively low. In addition, conventional gas-fired combined-cycle generation facilities have applied for interconnection in the Blythe area providing additional benefits for ratepayers if constructed. Portions of the DPV2 Project, such as the Devers-Valley No. 2 500kV Transmission Line, provide reliability benefits to the SCE electrical grid.

The DPV2 Project, when completed in Arizona, would help reduce congestion in a critically congested corridor between Arizona and California that has been deemed of national strategic

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<sup>15</sup> Additional information was provided telephonically by LADWP's Dr. Mohammad Beshir to SCE's Marco Ahumada on September 12, 2008. All LADWP cost data was provided to SCE in \$2006.

importance to the United States.<sup>16</sup> By reducing congestion in this corridor, especially during off-peak periods, completion of the Project in Arizona will complement the construction of the California portion of DPV2 and the interconnection of generation facilities in the Blythe area. For these reasons, SCE agrees with The Utility Reform Network (TURN) that the DPV2 Project, including the advanced construction of the California portion of the project, is reasonable in terms of costs to ratepayers.<sup>17</sup>

#### IV.

### **SCE WITHDRAWS ITS REQUEST TO SHORTEN THE COMMENT PERIOD BUT MAINTAINS THAT THE COMMISSION SHOULD PROCEED TOWARD A DECISION WITHOUT DELAY**

SCE is withdrawing its request that the Commission shorten the comment period on SCE's Amendment to ten (10) business days, agreeing that the typical thirty (30) day comment period will apply beginning on the date that SCE submitted its Amendment, *i.e.*, September 2, 2008. SCE maintains its request that the Commission grant SCE's Petition on an *ex parte* basis, without the need for hearings, which is consistent with other parties' previous indications that hearings should not be necessary. TURN and CAISO have indicated support for SCE's request and SCE believes DRA's concern primarily sought the information that SCE has provided in the Amendment. As such, SCE respectfully asserts that hearings are not necessary and requests that the Commission move forward on the Petition without delay.

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<sup>16</sup> In accordance with section 216(a) of the Federal Power Act, on October 2, 2007 the U.S. Department of Energy (DOE) issued an order for two National Interest Electric Transmission Corridor designations, including the Southwest Area National Corridor (Docket No. 2007-OE-02) encompassing the DPV2 project corridor.

<sup>17</sup> See Response of The Utility Reform Network to Edison's Petition for Modification of D.07-01-040, dated June 13, 2008, p. 1 (describing DPV2 as "a relative bargain in terms of the costs to ratepayers, even with the additional cost of over \$100 million for inclusion of the Midpoint Substation" and that "the potential for the ultimate completion of the Arizona portion of the project offers the opportunity to maximize the use of the line not only for new renewable generation but also for imports of excess power from the Palo Verde hub.").

V.

**CONCLUSION**

For the reasons set forth in SCE's Petition, Reply, the Amendment, and this Supplement, SCE requests that the Commission modify the D.07-01-040 so that SCE may commence construction of the California portion of DPV2. SCE respectfully requests that the Commission modify D.07-01-004.

Respectfully submitted,

JENNIFER HASBROUCK  
JULIE A. MILLER

/s/ Jennifer R. Hasbrouck

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Dated: September 12, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SUPPLEMENT TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) AMENDMENT TO PETITION FOR MODIFICATION OF DECISION NO. 07-01-040** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First-class mail will be used if electronic service cannot be effectuated.

Executed this **12th day of September, 2008**, at Rosemead, California.

/s/ Robin L. Taylor

\_\_\_\_\_  
Robin L. Taylor  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

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**ATTACHMENT A**  
**PROCEDURAL BACKGROUND**

On January 25, 2007, the California Public Utilities Commission (“Commission”) approved SCE’s application for a CPCN to construct the DPV2. To date, SCE has been unable to obtain approval from the Arizona Corporation Commission (“ACC”) for the Arizona portion of the Project, which evaluated in the Final EIR/EIS as part of DPV2. SCE is committed to obtaining approval for the Arizona portion of the Project, either through the ACC or through the Federal Energy Regulatory Commission (“FERC”). A short summary of the procedural background of SCE’s request follows.

On May 14, 2008, SCE filed a Petition to Modify Decision No. (D.) 07-01-040 (“Petition”), in anticipation of obtaining the approvals it needed to construct the Arizona portion of DPV2, and to position itself and the State of California to take advantage of potential generation sources (most of which are renewable) near Blythe, California. SCE requested that Commission allow it to commence construction of the California portion of DPV2.

On May 16, 2008, SCE requested the FERC initiate the pre-filing process for DPV2. On May 30, 2008, FERC granted SCE’s request.

On June 13, 2008, The Utility Reform Network (“TURN”) and the Division of Ratepayer Advocates (“DRA”) filed a Response to SCE’s Petition. CAISO filed an *ex parte* notice on June 12, 2008, with the Commission with a letter from Yakout Mansour, President, and Chief Executive Officer of CAISO that supported SCE’s request. On June 23, 2008, SCE filed a Reply to the Responses.

On July 17, 2008, the Assigned Commissioner and ALJ issued the Ruling directing Amendment of the Petition.

On August 6, 2008, SCE provided additional information to Commission staff, stating that an Addendum to the Final EIR/EIS is the appropriate document to address any potential CEQA impacts to initiating construction of the California portion of DPV2.

On September 2, 2008, SCE provided additional information to Commission staff, in response to a Joint Ruling of the Assigned Commissioner and Administrative Law Judge (“ALJ”) Directing Amendment of Petition for Modification (“Ruling”), dated July 17, 2008.

**ATTACHMENT B**

**DECLARATION OF MARCO AHUMADA**

I, Marco Ahumada, declare as follows:

1. I am the Southern California Edison Company's Project Manager for the Devers-Palo Verde No. 2 Project. I have personal knowledge of the facts stated in Sections II.A and II.B and if called as a witness, could and would competently testify thereto.

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

Executed this **12th day of September, 2008** at Rosemead, California.

/s/ Marco Ahumada

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Marco Ahumada

**ATTACHMENT C**

**DECLARATION OF FRANK L. HARRIS**

I, Frank L. Harris, declare as follows:

1. I am a Manager in the Business Planning and Financial Management Department of the Transmission and Distribution Business Unit of SCE.
2. I have personal knowledge of the facts stated in Section II., “TRTP 1-3 Project Costs,” and “TRTP 4-11 Project Costs”
3. I have personal knowledge of the Transmission and Distribution general escalation rates as described in Section II.

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

Executed this **12th day of September, 2008** at Rosemead, California.

/s/ Frank L. Harris

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Frank L. Harris



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