

**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)	Application No. 05-04-015
Necessity Concerning the Devers-Palo Verde)	(Filed April 11, 2005)
No. 2 Transmission Line Project)	
_____)	

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
SUPPLEMENTAL INFORMATION ON
PETITION FOR MODIFICATION OF DECISION NO. 07-01-040**

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 - Attachment B: May 15, 2009, Letter To ACC
 - Attachment C: May 18, 2009, Letter to FERC on Withdrawal of Pre-Filing Request
 - Attachment D: Declaration of David Kay
 - Attachment E: Declaration Of John Tucker
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Pursuant to the June 8, 2009, Administrative Law Judge’s Ruling Directing Supplementation of Record (“Ruling”) in the above-referenced docket, Southern California Edison Company (“SCE”) respectfully submits the requested supplemental information (“Supplemental Information”) on the Devers-Palo Verde No. 2 Transmission Line Project (“DPV2”). In connection with SCE’s pending Petition for Modification of Decision No. (D.) 07-01-040 (“Petition”), the Ruling requests that SCE file Supplemental Information regarding the following four general categories:

- (1) Current status of the California portion of the DPV2;
- (2) Status of the California Independent System Operator Corporation’s (“CAISO”) approval of the California portion of the DPV2;
- (3) Information regarding the Blythe Energy Project Phase I and Phase II; and
- (4) Information regarding cost estimates for the project.

SCE presents this information below.

I.

INFORMATION REGARDING THE CURRENT STATUS OF DPV2

The Ruling first directs that SCE file information on the current DPV2 status:

“Information regarding the current status of Project, including but not limited to any changes to cost estimates; pending applications before the ACC and Federal Energy Regulatory Commission (FERC); requests for generation interconnection pending before the California Independent System Operator Corporation (CAISO); any power purchase agreements between SCE and electricity generation developers that would be served by the Project; projections of energy resources identified by the Renewable Energy Transmission Initiative (RETI); and any other information provided by SCE as part of the Petition or the Amended Petition which the Commission should consider in its responsive decision.”¹

SCE presents the information on the current status of DPV2 in the sections below. Although the scope of DPV2 and the information on cost estimates has not changed since SCE filed its Petition, the values have been updated to 2009 constant dollars, as discussed in Section IV.

A. Status of Pending Applications Before the Arizona Corporation Commission (“ACC”) and the Federal Energy Regulatory Commission (“FERC”)

After ACC denied SCE’s application for approval of the Arizona portion of the Project in 2007, SCE continued to make significant efforts to license the Arizona portion of the Project, both at the FERC and ACC. These efforts included consultations with FERC on February 28, 2008, and a May 16, 2008, request to initiate the FERC pre-filing process. FERC initiated the pre-filing consultation process on May 30, 2008.

In addition, consistent with direction from the ACC, SCE met with stakeholders in Arizona in an effort to determine whether there were reasonable enhancements to the Arizona portion of the project that would garner additional support for a re-opening of the matter before the ACC. On November 7, 2008, SCE reported on these efforts to the ACC at a Special Open

¹ Ruling, p. 2.

meeting on DPV2. After the November 7 Open Meeting, SCE engaged in further discussions with Arizona stakeholders on whether the Project could provide additional benefits to Arizona ratepayers.

On February 9, 2009, SCE filed a report on its meet-and-confer efforts in Arizona, and indicated that SCE was in the process of updating its previous economic analysis to incorporate updated conditions and assumptions. SCE completed its analysis in May 2009, and promptly informed the ACC that it was not able to proceed immediately with permitting the Arizona portion of DPV2.²

The May 15 letter to the ACC noted that, since the time SCE filed its first application in Arizona, some important changes have taken place. Along with the increased renewable generation interest in the Blythe area, there has been a narrowing of the economic spread between the costs of California and Arizona generating resources, and a reduced load forecast due to changed economic conditions and the expansion and success of energy efficiency. As a result, the benefits to California consumers of SCE pursuing the Arizona portion have been reduced from the level forecast at the time of SCE's initial filing in with the ACC.

Currently, four large solar generation projects in Western Arizona, totaling 2,950 MW, have requested interconnection to the CAISO grid. Although SCE is not able to proceed immediately with permitting the Arizona portion of the Project, SCE stated that if the interconnection studies established the need for new transmission in Western Arizona, SCE will seek authorization from the applicable agencies to construct the necessary transmission.

The Ruling states that SCE's May 15, 2009, *ex parte* included a letter to the ACC "informing them that SCE was withdrawing its application before the ACC for the Arizona portion of the Project",³ and stating its intention to pursue the California portion of the Project. To be precise, SCE's original application was no longer pending before the ACC, and SCE had

² May 15, 2009, letter to ACC, p. 2. As noted in the May 15, 2009, Ruling, SCE filed a notice of *ex parte* communication, which included a copy of a letter to the Commissioners, dated May 15, 2009. Copies of the May 15, 2009, letters to the Commission and ACC are attached as Attachments A and B, respectively.

³ Ruling, p. 1.

not filed a new application at the ACC for the Arizona portion of DPV2. The ACC had called a Special Open Meeting on May 19, 2009, and the ACC may have been expecting that SCE would announce at that Open Meeting when SCE would file such an application.⁴ The purpose of the May 15, 2009, letter to the ACC was to explain to the ACC that SCE would not be filing a new application at that time, but would do so if further analysis supports such:

“While SCE is not able to proceed immediately with permitting the Arizona portion of the Project, we are committed to find a way to do so if further analysis supports this approach.”⁵

SCE also indicated that it was ceasing its pre-filing activities at FERC. Concurrently, SCE sent a letter to the FERC stating that SCE will cease the current pre-filing activities at FERC. A copy of the letter to FERC is provided in Attachment C.

SCE explained in its May 15, 2009, letter to the Commission that SCE is still committed to the California portion of the Project:

“... SCE remains committed to obtaining CPUC approval for construction of the California portion of the Project, pursuant to SCE’s petition for modification currently pending before the Commission. We recognize that the Commission may seek to consult with the California Independent System Operator in light of SCE’s decision to not pursue construction of the Arizona portion of the project. In our conversations, the CAISO have indicated that they desire the California portion of the project with the Midpoint Switchyard to move forward, but need to further review in compliance with their existing tariffs since the overall project has changed from primarily a economic interconnection project, to one needed to interconnect significant amounts of new generation. It is also our understanding that the CAISO will shortly be directly informing the Commission as to their thoughts on the Project and their efforts in reaching timely approval.”⁶

SCE’s May 15, 2009, letter from SCE to the Commission states that following the Commission’s approval of the Petition, SCE will proceed to complete the licensing work to obtain a Record of Decision from the Bureau of Land Management (“BLM”). At that time, SCE estimated the

⁴ The ACC ultimately cancelled the May 19 Special Open Meeting.

⁵ May 15, 2009, letter to ACC, p. 2.

⁶ See, Attachment A, May 15, 2009, letter from Bruce Foster to President Peevey, p. 1.

BLM effort will likely be completed about three months from its initiation. Since then, SCE has re-estimated its permitting schedule. SCE now forecasts, based on detailed schedule estimates with permitting experts that it could take approximately six months for a Record of Decision and an additional six months for a Notice to Proceed from BLM. Thus, it is likely that a Notice to Proceed would not be issued until 12-14 months after a Commission decision on SCE's Petition.⁷

B. Requests for Generation Interconnection Pending Before the CAISO

SCE filed its Petition in order to allow it to begin construction of the California portion of DPV2 and take advantage of potential generation resources (much of which are renewable) near Blythe, California. The Ruling directs SCE to file supplemental information for the record on requests for generation interconnection pending before the CAISO.

As of June 26, 2009, interconnection requests in the Blythe area total 6110 MW. As shown in Table 1, of this total, 4900 MW are composed of new renewable generation resources, and 1210 MW are composed of conventional gas-fired generation resources. The values in Table 1 have been updated since SCE filed its Amendment to Petition for Modification of Decision No. 07-01-040 on September 2, 2008, to reflect changes since that time.⁸

⁷ See, Attachment D, Declaration of David Kay.

⁸ See, Attachment E, Declaration of John Tucker.

Table 1
Generation Interconnection Requests in the Blythe Region
(MW) as of June 26, 2009

Renewable Generation	
Midpoint	2950
Julian Hinds-Eagle Mountain Area	1950
Total	4900
Conventional Generation	
Midpoint	1210
Total Requests to Interconnect	
Midpoint (2950 + 1210)	4160
Julian Hinds-Eagle Mountain Area	1950
Total	6110

At this time, the CAISO and SCE have received interconnection requests from these potential generation resources. The potential generation resources in the Blythe Area (other than the Blythe Energy Project Phase II (“BEP II”) for the most part are in the early interconnection stages and, thus, specific project information beyond that required to perform interconnection studies is limited.

Interconnection requests, however, are typically made early in the planning process, and are subject to significant uncertainty as to whether the project sponsors ultimately complete the required studies and proceed to an interconnection agreement under the CAISO’s interconnection process. A project may undergo significant changes during the interconnection study process, which could significantly impact the scope of their potential environmental impacts.

Interconnection requests for generators larger than 20 MW are processed under the FERC Large Generation Interconnection Procedures, which is administered by the CAISO. In September of 2008, the FERC approved the modified Generator Interconnection Process Reform (“GIPR”) for large generators, which is currently being implemented. Interconnection requests that were active at the time of FERC approval have been segregated into two groups: a Serial Study Group, which will follow the prior (un-reformed) procedures; and the Transition Cluster,

which will follow the GIPR process. Generators in the Transition Cluster were required to pay increased study and site control deposits to remain in the interconnection process. Generators that chose not to pay these increased deposits were considered withdrawn from the interconnection process effective November 25, 2008.

The values in Table 1 reflect the changes to the queue after the withdrawals. The values in Table 1 do not include requests for interconnection to the Arizona portion of the existing Devers-Palo Verde 500 kV line. At this time, interconnection requests to the Arizona portion of the Devers-Palo Verde 500 kV line include 2700 MW of renewable solar generation. This means 4900 MW of renewable generation and 1210 MW of conventional generation has requested interconnection in the Blythe area to the Devers-Palo Verde 500 kV line in California, and an additional 2700 MW of renewable generation has requested interconnection to the Arizona portion of the Devers-Palo Verde 500 kV line.

C. Power Purchase Agreements

On June 17, 2009, SCE signed a power purchase agreement with Solar Millennium, for a 242 MW of solar resources from a project called CA Solar 10, located near Desert Center California.⁹ The agreement provides for an option for the purchase of an additional 242 MW that would be available if the solar project is expanded, for a maximum of 484 MW. The solar project is expected to begin operation in June 2013. This project has requested interconnection to the California portion of DPV1 or DPV2 and is included within the totals of Table 1. SCE has not signed a power purchase agreement with the Blythe Energy Project Phase 2, or other developers shown in Table 1.

Negotiations with other pending projects in the queue may result in other power purchase agreements being executed, but many of the generation project developers have indicated to SCE that renewable project development is hindered by the uncertainty that results from what has

⁹ See, Attachment F, Declaration of Gary Allen.

been called the “chicken-and-the-egg problem.” This problem is discussed in Section I.E. below, and simply reflects the realities of developing new generation -- the possibility that transmission will not be available when and where it is needed is a risk that developers simply will not take. As a result, developers will not commit capital to develop new generation projects unless they are assured adequate and timely transmission will be available to them. However, often the needed transmission cannot be licensed unless the generator has made the financial commitment.

D. The Renewable Energy Transmission Initiative Identifies 8,570 MW of Renewable Energy Potential in Eastern Riverside County

The Ruling directs SCE to file supplemental information for the record regarding projections of energy resources identified by the Renewable Energy Transmission Initiative (“RETI”).¹⁰ The Final RETI Phase 1B Report (“Phase 1B Report”) identifies a renewable energy capacity potential generation of 8570 MW from Riverside County.¹¹ While it is not certain that all of this potential generation will actually be built, the RETI determination demonstrates that the area traversed by DPV2 in Riverside County is rich in potential for renewable resources.

The Draft RETI Phase 2A Report identifies California’s Conceptual Transmission Plan, which includes major transmission lines and other facilities likely to be required not only to deliver renewable energy, but also provide important additional benefits to the grid. The California portion of the DPV2 is included as a component of this Conceptual Transmission Plan. This project has the advantage of being before the Commission and can be completed in a timely fashion, provided the Commission acts quickly.¹²

¹⁰ Ruling, p. 2.

¹¹ RETI Phase 1B Report, Black & Veatch, dated January 2, 2009, Table 1-1 on p. 1-4.

¹² See, June 3, 2009 RETI Report, Table 3-15, page 3-17 and Appendix G, page G-22) More specifically, the California portion of DPV2 is discussed in the June 3, 2009 RETI Report under Appendix G - Description of Line Segments within the Phase 2A Report (page G-22). DPV2 is listed as MIDP_DESC_1, and the description states that “This 50 mile RETI single circuit line connecting the new Midpoint (also known as Colorado River)

Continued on the next page

The RETI Phase 1B Report describes the significant resource potential in the area traversed by DPV2:

“The Southeast California resource area contains the largest quantity of potential {solar} resources. This area extends east of the Los Angeles basin to the Nevada and Arizona borders, and includes most of San Bernardino and Riverside counties. There is an extensive transmission network in the region, which currently serves to connect Southern California to Nevada and Arizona. The CAISO has approved development of the Devers-Palo Verde 2 line, which will increase transfer capability from Arizona or the Southeast California resource area to the Los Angeles area by approximately 1,200 MW. Energy generated in this region would be delivered to the Los Angeles area.”¹³

In response to the Ruling’s request for information on the projects identified by RETI, the August 2008 Final Phase 1A Report identified the major “Competitive Renewable Energy Zones” (“CREZ”) in California and specified that the total solar energy potential in Riverside County (including the Blythe area) far exceeds the MWs associated with the projects currently in the CAISO interconnection queue or those that have requested rights-of-way at BLM. This evaluation was further refined in the January 2009 Final RETI Phase 1B Report that indicates the following renewable resources in Riverside County:¹⁴

Table 2
Renewable Energy Potential

Riverside East – A	1,000 MW
Riverside East – B	6,800 MW
Palm Springs	770 MW
Total - Riverside County	8,570 MW

Continued from the previous page

500kV substation with Desert Center 500/230 kV Substation has been dropped and been replaced by the SCE proposed Mid Point-Devers-Valley 500 kV line No.2 (California portion of the old DPV2 project). The line is planned to access Competitive Renewable Energy Zones from the Riverside East area.” An earlier proposed thirdline was dropped and replaced by DPV2.

¹³ RETI Phase 1B Report, dated January 2, 2009, p. 4-13.

¹⁴ RETI Phase 1B Report, Black & Veatch, dated January 2, 2009, Table 1-1 on p. 1-4.

In addition, RETI submitted a Draft Phase 2A report on June 3, 2009, in which the RETI Stakeholder Steering Committee presented Conceptual Transmission Plans to integrate the CREZ areas identified in the Phase 1 reports. Although currently in draft form, the RETI Phase 2A Report identified three separate classifications of transmission network upgrades: Renewable Foundation lines, Renewable Delivery lines, and Renewable Collector lines. Definitions of these upgrades, provided by RETI, are as follows:

Renewable Foundation lines increase the capacity of the California transmission network between Palm Springs and Sacramento, allowing energy to flow north or south as needed. There are 14 key line segments in the Foundation Group. The capacity these lines provide is likely to be essential to be able deliver renewable energy from any CREZ to consumers in all major load centers. The usefulness of the Foundation Group is not limited to renewable energy. The increased capacity these lines provide is likely to be needed to meet growing energy demand regardless of generation source.

Renewable Delivery lines move energy from Foundation lines to major load centers. The increased capacity provided by the lines of this group is likely to be needed to meet growing energy demand regardless of generation source. There are 13 major line segments in the Renewable Delivery Group.

Renewable Collector lines carry power from CREZ to Foundation and Delivery lines. These line segments are grouped geographically into projects capable of accessing adjacent CREZ. There are 12 groupings of collector lines. Several of these lines form portions of or connect to major inter-tie lines connecting California to the western regional grid, and therefore provide access to out of state resources.¹⁵

The RETI Phase 2A Conceptual Transmission Plan includes the California portion of the DPV2 line project from the proposed new Midpoint Switchyard to Valley Substation. The DPV2 line is comprised of the following three line segments in the RETI Conceptual Transmission Plan.

¹⁵ Draft RETI Phase 2A Report, dated June 3, 2009, p. 1-14.

1. Midpoint-Desert Center 500 kV line segment.
2. Desert Center-Devers 500 kV line segment.
3. Devers-Valley 500 kV line segment.

The Draft RETI Phase 2A Report characterizes line segments Midpoint-Desert Center and Desert Center-Devers as “Renewable Collector” lines and the Devers-Valley line segment as “Renewable Delivery” line per classification of lines in the RETI Conceptual Transmission Plan.

All three line segments of the DPV2 project together form the transmission link in the RETI Phase 2A Conceptual Transmission Plan to access the RETI identified Riverside CREZs renewable power and deliver it to load centers in California.

E. Other Information that SCE has Previously Provided that the Commission Should Consider

The Ruling states that SCE should provide any other information provided by SCE as part of the Petition or the Amended Petition that the Commission should consider in its responsive decision. Several developers have indicated to SCE their concern that the lack of certainty on whether the California portion of DPV2 will be built has hindered their ability to construct generation projects.¹⁶ For example, Chevron Energy Solutions stated that it is committed to helping California meet its RPS goals. However, it explained this “chicken-and-the-egg” problem has impacted its ability to develop and enter into power purchase agreements to construct solar projects because Chevron Energy Solutions’ activities are contingent upon the timely completion of DPV2 and Midpoint Switchyard:

“Without a clear timeline for completion of these transmission facilities, expeditiously moving forward with these projects would be premature, due to the capital cost uncertainty attributable to potential project delays.”

“The clear benefit to proceeding with construction of the California portion of the DPV2 line on the earlier schedule that

¹⁶ See, Attachment G, letters from Developers.

SCE proposes is that it will provide an opportunity to build these solar projects sooner and consequently meet California's RPS goals sooner. With the high capital cost of solar projects, it is not economically viable to build these solar projects in advance to demonstrate a need for the transmission facilities. Consequently, delaying the construction of the DPV2 transmission facilities result in corresponding delays to our solar project development efforts. Based on our current development schedules and assuming that we have near-term assurances, we could begin using the DPV2 transmission facilities and the Midpoint Switchyard by mid-2012. Note that this date is consistent with the proposed SCE schedule. Delaying construction of the DPV2 facilities to meet the proposed DRA schedule would result in delaying our solar development efforts by a year or more."

II.

INFORMATION ON CAISO'S APPROVAL OF THE CALIFORNIA-ONLY PROJECT

The Ruling directs SCE to present information regarding the status of CAISO's approval of the California-only project.

SCE has been in discussions with the CAISO regarding approval for the California portion of the Project.¹⁷ On June 19, 2009, the CAISO sent a letter to ALJ Kolakowski, regarding conditions for CAISO Agreement to Construction of the California Portion of DPV2.¹⁸

CAISO states that the California portion of the project continues to provide operational and reliability benefits, and that CAISO has identified the anticipated need for the project as a generation interconnection facility, which provides the basis for the CAISO's agreement to the construction of the California portion of the project, should certain requirements be met. Namely, the CAISO is responsible for certain interconnection studies to determine the facilities needed to interconnect new generation to the transmission system. At the conclusion of the interconnection study process, the CAISO, generator, and Participating Transmission Owner

¹⁷ See, Attachment H, Declaration of Dana Cabbell.

¹⁸ See, Attachment I, June 19 CAISO letter, p. 2-3.

enter into a Large Generator Interconnection Agreement that describes the transmission upgrades and the responsibility for the associated costs.

The CAISO states that its queue for interconnection requests in the Blythe area contains eleven requests for interconnection of proposed renewable facilities, totaling 4900 MW. Additionally there are interconnection requests in the CAISO's queue for 1210 MW of proposed new conventional gas-fired generation in the Blythe area, resulting in a total of 6110 MW of interconnection requests in the Blythe area.

CAISO states that it will identify the Midpoint Switchyard as needed for the first project to reach the point of executing an LGIA:

“The ISO’s studies continue to indicate that a new Midpoint substation is needed for any new generating facility requesting to interconnect to the existing Devers-Palo Verde No. 1 line in the Blythe area. Based on the ISO’s interconnection studies, this new substation will be identified as a needed facility connecting to the Devers-Palo Verde No. 1 line for the first project to reach the point of executing an LGIA. The substation is also a critical element for interconnection to the California portion of the proposed Devers-Palo Verde No. 2 transmission line.”¹⁹

The CAISO goes on to state that it anticipates that the second line from Midpoint substation to Valley substation will be needed once the following has occurred:

“(1) any combination of the following have occurred for requests for interconnection to the Devers-Palo Verde No. 1 line in the amount of at least 1030 MW of full capacity generating facilities:

- (a) LGIAs have been executed by generating facility developers, SCE, and the ISO pursuant to Section 11 of Appendix U or Y of the ISO tariff; or
- (b) the ISO has received the initial posting of interconnection financial security by generating facility developers pursuant to Section 9.2 of Appendix Y (subject to Section 6 of Appendix 2 of Appendix Y) of the ISO tariff; and

(2) the ISO has completed the interconnection studies for the plan of service for at least one of those proposed generating facilities in

¹⁹ See, Attachment I, June 19 CAISO letter, p. 2-3.

which the California portion of the proposed Devers-Palo Verde No. 2 project, including the new Midpoint to Valley line, has been identified as needed network upgrade facilities to accommodate that generating facility, pursuant to Section 8 of Appendix U or Section 7 of Appendix Y of the ISO tariff, and

(3) an LGIA has been executed by a generating facility developer, SCE, and the ISO pursuant to Section 11 of Appendix U or Y of the ISO tariff in which the California portion of the proposed project, including the new Midpoint to Valley line, has been identified as needed network upgrade facilities to accommodate the generating facility for which the LGIA has been executed.”²⁰

The CAISO GIPR initially created two CAISO groups. Generation interconnection requests that had met certain milestone criteria by a date established by the CAISO and approved by FERC were placed in the CAISO Serial Study Group and continued to be studied on a serial, incremental basis. Interconnection requests that did not meet the specified criteria were placed in the CAISO Transition Cluster. The Serial Study Group in the Blythe area includes interconnection requests from both conventional gas-fired generators and renewable generators, totaling 1120 MW. The Transition Cluster in the Blythe area includes interconnection requests from both conventional gas-fired generators and renewable generators totaling 4990 MW. The Transition Cluster projects are required to provide an initial posting of interconnection financial security by November 2009 to stay in the Transition Cluster.

Basically, the CAISO’s first condition above would mean that the 1030 MW of full capacity generating facilities (e.g., developers that have requested full deliverability of their capacity) could be from the combination of: (a) executed LGIAs, either from a generator in the Serial Study Group or Transition Cluster, or (b) a generator developer in the Transition Cluster that made an initial posting of financial security.

If not all of the 1030 MW is fulfilled by projects in Section (a) of the first condition, then the balance of the 1030 MW needs to be made up by projects that meet the criteria in Section (b). Once the 1030 MW complement is attained, the CAISO’s second and third conditions apply.

²⁰ See, Attachment I, June 19 CAISO letter, p. 2-3.

The CAISO's second condition essentially means that there would have to be at least one completed interconnection study that identifies the Midpoint to Valley transmission line as needed. The third condition is that there would then have to be at least one executed LGIA from a project identified in Condition (1)(b) that identifies the Midpoint to Valley transmission line as needed.

SCE expects that CAISO's determination for the California portion of DPV2 could be made by December 2009. This would happen if sufficient generation in the Serial Study Group executes LGIAs to satisfy Condition (1)(a). If that does not happen, then the CAISO's determination of need could come as late as January 31, 2011, if the determination of need is triggered by the Transition Cluster.

III.

INFORMATION ON THE STATUS OF THE BLYTHE ENERGY

PROJECT PHASE I AND II

The Ruling directs SCE to file supplemental information into the record regarding:

“Information known by SCE regarding the status of the Blythe Energy Project Phase I and Phase II generation facilities as well as any associated transmission built, permitted or planned regarding those generation projects, and how those Blythe generation projects are related to the Project.”

SCE presents this information below.

A. Blythe Energy Project Phase I

The Blythe Energy Project Phase I (“BEP I”) is an operational 520 MW conventional combined cycle gas generation project located in the City of Blythe, California. It is owned by NextEra Energy Resources, LLC (formally Florida Power and Light), and became operational in 2003.

The BEP I project is currently connected to Western Area Power Administration's (“WAPA”) transmission system and a portion of the BEP I generation is delivered to the CAISO

grid, as scheduled interchange, via SCE's existing Blythe-Eagle Mountain 161 kV line. The Blythe-Eagle Mountain 161 kV line cannot accommodate the BEP I project's full output to be delivered to the CAISO grid as desired by NextEra Energy. Therefore, NextEra Energy has elected to permit and construct a new 230 kV radial generation tie line from the BEP I project to SCE's Julian Hinds Substation in order to directly connect the BEP I project to the CAISO controlled grid. The new generation tie line will be approximately 67 miles long and will be constructed, owned, operated, and maintained by the BEP I project. SCE will construct and own additional facilities at its existing Julian Hinds Substation that are required to connect the new generation tie line to the CAISO grid. Following completion of the new generation tie line and associated interconnection facilities, the BEP I project will be disconnected from WAPA's transmission system and subsequently connected solely to the CAISO grid via the new generation tie line. The BEP I project is currently constructing the new generation tie line. The line is expected to be completed, along with the associated SCE interconnection facilities at Julian Hinds Substation, in May 2010. The connection of the BEP I project directly to the CAISO grid as described above does not require any portion of the DPV2 Project to be constructed and placed in service.

B. Blythe Energy Project Phase II

BEP II is a proposed 570 MW conventional combined cycle gas generation project to be owned by Caithness Energy. BEP II is expected to connect to the CAISO grid at SCE's proposed Midpoint Switchyard via a new 8-mile (approximate), 500 kV radial generation tie line. It is SCE's understanding that the 8-mile, 500 kV generation tie line is one of two circuits proposed by Desert Southwest Power, LLC a Caithness Energy company, that will comprise the Desert Southwest Transmission Project ("DSWTP") as further described below. The BEP II project requires the 8-mile 500 kV generation tie line and Midpoint Switchyard to connect to SCE's DPV1 line on the CAISO grid. The BEP II project does not require the second DSWTP 500kV circuit between Keim and Devers or any portion of the DPV2 line to connect and deliver

energy to the CAISO grid. SCE understands that Caithness Energy currently anticipates the 8-mile generation tie line and Midpoint Switchyard to be in service by year end 2012 to achieve a June 2013 commercial operation date for the BEP II project. SCE, the CAISO and Caithness Energy are negotiating LGIA for the BEP II project, which could be executed in the coming months. The BEP II Project received conditional certification for its initial 520 MW at the California Energy Commission in December 2005.

C. Desert Southwest Transmission Project

The DSWTP is a new 500kV line proposed by Desert Southwest Power, a Caithness Energy company, comprised of two circuits. The first of the two circuits that will comprise the DSWTP is the 8-mile radial generation tie line for the BEP II project as discussed above. The second of the two circuits that will comprise the DSWTP will be a radial 500kV line to connect a future Keim Substation, near the BEP II project, to SCE's Devers Substation. The two circuits are not initially planned to be electrically connected at Keim. Any future plan to connect the two circuits at Keim has not been analyzed by SCE and the CAISO. It is SCE's understanding that Desert Southwest Power, LLC will construct, own, operate and maintain the DSWTP, including the 8-mile generation tie line that will connect the BEP II project to Midpoint Switchyard. The facilities required at Midpoint Switchyard to interconnect the 8 mile generation tie line will be owned, operated, and maintained by SCE. The DSWTP received its Record of Decision from the BLM in September 2006. SCE understands that Desert Southwest Power, LLC is currently working with the BLM on its development plan as required in its BLM Record of Decision.

IV.

COST ESTIMATE FOR THE PROJECT

The Ruling states that SCE should provide information regarding the current status of the Project, including but not limited to any changes to cost estimates.²¹

²¹ Ruling, p. 2.

In D.07-04-040, the Commission adopted SCE’s uncontested cost-estimates, in \$2005, as shown in SCE Exhibit 31. A rough delineation of the costs that were provided in evidentiary hearings is provided in the Petition,²² and is shown in Table 3 below.

Table 3
Costs for DPV2
(\$2005, Based on Preliminary Estimates Provided in Exhibit 31)

Devers-Valley No. 2	\$ 90 million
Devers to the California Border (without Midpoint)	\$267 million
California Border to the Harquahala ²³	<u>\$188 million</u>
Total	\$545 million

Table 3 shows that construction of DPV2 would include an estimated \$90 million for Devers-Valley No. 2 (“DV2”), \$267 million for Devers to the California border, and \$188 million for the California Border to Harquahala for an estimated total of \$545 million in \$2005.

In SCE’s May 14, 2008, Petition, SCE presented current estimates for the Midpoint Switchyard in \$2008. SCE stated that the Midpoint Switchyard would add approximately \$101.9 million (2008 dollars including pensions and benefits, administrative and general overheads, not including Allowance for Funds Used During Construction) to the Project. These costs are for the switchyard only.

The cost-estimates for DPV2 that SCE presented in its May 14, 2009, Petition still represent SCE’s best information regarding the scope of work necessary to facilitate generation interconnection in the Blythe area. However, the cost estimate for Midpoint Switchyard was prepared using 2008 constant dollars, and the estimates for all other portions of DPV2 were

²² Petition, p. 11.

²³ SCE’s May 14, 2008, Petition erroneously referred to this as Harquahala Junction; it should correctly be referred to Harquahala, or Harquahala Generation Station.

prepared using 2005 constant dollars. SCE recognizes that it may be helpful for the Commission to have the cost-estimates presented in 2009 dollars and provides this information below.²⁴

As shown in Attachment K, SCE escalated 2005 constant dollars for the Project to 2009 constant dollars using general escalation rates. All estimates included pensions and benefits, administrative and general overheads, and did not include an Allowance for Funds Used During Construction.²⁵ Attachment K shows that construction of the DPV2 would include an estimated \$113 million for DPV2, \$333 million for Devers to the California border, and \$235 million for the California border to Harquahala for an estimated total of \$686 million in \$2009.

Again, the costs presented in Attachment I should not be construed as a new cost-estimates for the Project. Attachment I simply presents the uncontested estimate that SCE previously provided during hearings in Exhibit 31 (and that the Commission adopted), escalated to 2009 dollars using general escalators. For example, SCE does not include additional costs due to mitigation measures or unknown conditions specific to the Project and it does not include allowances for U.S. dollar exchange rates, or commodity and labor increases specific to the Project. In Attachment L, SCE shows the costs for the California portion of DPV2, including the Midpoint Switchyard as being approximately \$526,291,000 in \$2009, including pensions and benefits, administrative and general expenses, but excluding AFUDC. SCE estimates that AFUDC will be \$135 million (nominal dollars). The cost for the California portion of the Project reflects an adjustment of \$25,817,000, for the elimination of 15 miles of transmission line from Midpoint Switchyard to the California border.

²⁴ See, Attachment J, Declaration of Anjan Ghosh.

²⁵ The work associated with the physical interconnection of specific generating facilities in the Midpoint area will not be a part of DPV2, and instead is subject to the rules established by the FERC, the CAISO Tariff, and the individual interconnection agreements. For instance, generators wishing to connect to the 500 kV bus at Midpoint Switchyard would pay up front for the cost of the 500 kV position and would be eligible for a refund over a period of five years following the commercial operation date of the generation resource. A generator connecting to a 230 kV bus at Midpoint Switchyard would be subject to the same rules and tariffs; however the refund would not apply to the transformation down to the 230 kV level unless the 230 kV facilities were a part of networked facilities.

As SCE has previously stated, in accordance with D.07-01-040, SCE intends to provide revised estimates upon completion of final engineering. In D.07-01-040, the Commission approved approximately \$545,285,000 (2005 dollars direct, contingency, P&B, and A&G), as the maximum cost for DPV2, subject to certain adjustments:

“10. Pursuant to Pub. Util. Code § 1005.5(a), the maximum cost determined to be reasonable and prudent for the DPV2 project, including pension and benefits, and administrative and general expenses, but excluding, Allowance for Funds Used During Construction, is \$545,285,000 in 2005 dollars, to be decreased by \$24,080,000 if the Devers-Harquahala line is terminated by Harquahala Junction and increased by \$8,282,000 if the Alligator Rock-North of Desert Center route segment is used. The Handy-Whitman Index of Public Utility Construction Costs shall be used in assessing compliance with the authorized maximum cost.”²⁶

The Commission recognized that SCE’s cost-estimates were based on preliminary engineering. The Commission ordered SCE to update its costs via an advice letter, based on the final route for DPV2. SCE was to update its cost if the final detailed engineering for the final route resulted in design-based construction estimates that are higher, or lower than the Commission authorized in D.07-01-040:

“12. If SCE’s final detailed engineering design-based construction estimate for the authorized project exceeds the authorized maximum cost, SCE shall, within 30 days, file an advice letter to seek an increase in the approved maximum cost pursuant to § 1005.5(b), and shall address whether the cost increases affect the cost effectiveness and need for the DPV2 Project.”²⁷

And:

“Once SCE has developed a final detailed engineering design-based construction estimate for the final route, if this estimate is one percent or more lower than the authorized maximum reasonable and prudent cost identified in Conclusion of Law 10, SCE shall, within 30 days, file and advice letter to show cause why the Commission should not

²⁶ D.07-01-040, mimeo., p. 115, Ordering Paragraph No. 10.

²⁷ *Id.* at pp. 115-116, Ordering Paragraph No. 11.

adopt a lower amount as the maximum reasonable and prudent cost to reflect the final estimate.”²⁸

SCE believes that the Commission did not intend for SCE to be filing multiple advice letters ‘updating’ the cost, based on regulatory events or before the final route was determined.

If, however, the Commission prefers to use constant dollars escalated to 2009 (instead of 2005 dollars) and reflect only the California portion of the Project, SCE suggests that the following revision to Ordering Paragraph No. 10 would accomplish this (additions shown with underline, and deletion shown with strikethrough):

“10. Pursuant to Pub. Util. Code § 1005.5(a), the maximum cost determined to be reasonable and prudent for the California portion of the DPV2 project, including pension and benefits, and administrative and general expenses, but excluding, Allowance for Funds Used During Construction, is ~~\$545,285 in 2005 dollars~~ \$526,291,000 in 2009 dollars, to be ~~decreased by \$24,080,000 if the Devers-Harquahala line is terminated by Harquahala Junction and~~ increased by ~~\$8,282,000~~ \$10,334,000 if the Alligator Rock-North of Desert Center route segment is used. The Handy-Whitman Index of Public Utility Construction Costs shall be used in assessing compliance with the authorized maximum cost.”²⁹

As a procedural matter, SCE requests that the Commission maintain the adopted maximum cost adopted by the Commission in D.07-01-040, reflecting the California portion of the Project, at this point in time. SCE will provide the updated maximum costs at a later date, once the final route is known³⁰ and it has completed final engineering, as provided in D.07-01-040.

SCE will file that advice letter when SCE knows the final route for the California portion of DPV2 (including the route that BLM adopts for the Alligator Rock area), and has completed final engineering. SCE believes this comports with the Commission’s order to file an Advice Letter with the final detailed construction cost-estimate, once SCE knows the final route, and has completed final engineering.

²⁸ *Id.* at p. 115, Ordering Paragraph No. 11.

²⁹ D.07-01-040, mimeo., p. 115, Ordering Paragraph No. 10.

³⁰ For example, the final route that BLM adopts for Alligator Rock.

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.07-01-040.

Respectfully submitted,

JENNIFER R. HASBROUCK
JULIE A. MILLER

/s/ Julie A. Miller
By: [Julie A. Miller](#)

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

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[Post Office Box 800](#)
[Rosemead, California 91770](#)
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Facsimile: [\(626\) 302-2610](#)
E-mail: julie.miller@sce.com

Dated: June 26, 2009

Attachment A

May 15, 2009, Letter to Commission



Bruce C. Foster
Senior Vice President
Regulatory Affairs

May 15, 2009

President Michael R. Peevey and Commissioners
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Devers-Palo Verde No. 2 ("DPV2") Electric Transmission Project
Application No. 05-04-014

Dear President Peevey and Commissioners:

I am writing to provide you with an update on Southern California Edison Company's ("SCE's") activities related to the Arizona portion of the DPV2 transmission line project (the "Project"). Please refer to the attached SCE letter to the Arizona Corporation Commission ("ACC") and to my synopsis below outlining the reasons SCE has decided to not file with the ACC seeking to build the Arizona portion of the Project at this time.

As you are aware, the ACC denied SCE's application for approval of the Arizona portion of the Project. Since that time, SCE has exerted significant effort in Arizona working with Arizona stakeholders, including the ACC and its staff, seeking to reconfigure the Arizona portion of the Project in a manner that might lead to a successful project in Arizona. However, since that time, some very important changes have taken place which SCE reflected in a recent update to its economic assessment. Along with the increased renewable generation interest in the Blythe area, there has been a narrowing of the economic spread between California and Arizona resources and a reduced load forecast due to changed economic conditions and the success of energy efficiency. As a result, the benefits of California consumers for SCE pursuing the Arizona portion of the Project have reduced significantly from the level forecast at the time of SCE's initial filing.

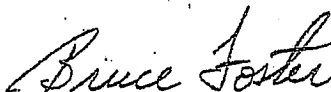
Despite the decision to not pursue the Arizona portion, SCE remains committed to obtaining CPUC approval for construction of the California portion of the Project pursuant to SCE's petition for modification currently pending before the Commission. We recognize the Commission may seek to consult with the California Independent System Operator in light of SCE's decision to not pursue construction of the Arizona portion of the Project. In our conversations, the CalISO have indicated that they desire the California portion of the project with the Midpoint Switchyard to move forward, but need to further review in compliance with their existing tariffs since the overall project has changed from primarily a economic interconnection project, to one needed to interconnect significant amounts of new generation. It's also our understanding that the CalISO will shortly be directly informing the Commission as to their thoughts on the Project and their efforts in reaching a timely approval.

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San Francisco, Ca 94102
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Fax: (415) 929-5540
bruce.foster@sce.com

In any case, SCE continues to believe the California portion of the Project is needed and continues to desire that the Commission proceed with our Petition to Modify ("PTM"). Note that following the Commission's approval of the PTM, we will proceed to complete the licensing work to obtain a Record of Decision from the Bureau of Land Management ("BLM"). The BLM effort will likely be completed in about three months from its initiation, which should dovetail nicely into the CalISO's schedule for a positive determination of the California portion of the Project, with the Midpoint Switchyard.

Thank you for providing ongoing support in this matter. If you have any questions, please do not hesitate to contact me at 415-929-5512.

Very truly yours,



Bruce C. Foster

Attachment

cc: Commissioner John A. Bohn
Commissioner Rachelle B. Chong
Commissioner Dian M. Grueneich
Commissioner Timothy Alan Simon
Julie Fitch, Director, CPUC Energy Division

Attachment B

May 15, 2009, Letter to ACC



Pedro J. Pizarro
Executive Vice President

May 15, 2009

VIA Hand-Delivery

Chairman Kristin K. Mayes
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Re: May 19, 2009 Special Open Meeting, Docket No. E-00000P-08-0570 Matters
Pertaining to the Devers-Palo Verde No. 2 Electric Transmission Line

Dear Chairman Mayes:

I am writing to provide you with an update on Southern California Edison Company's ("SCE's") activities related to the Arizona portion of the Devers-Palo Verde No. 2 transmission line project (the "Project").

As we have discussed on several occasions, SCE's belief that the Arizona portion of the Project would provide important benefits to both California and Arizona was based in part on an economic analysis and underlying assumptions originally filed with the ACC on May 1, 2006. In SCE's February 9, 2009 Meet and Confer Report (the "Report"), SCE explained that we were in the process of updating our previous economic analysis, including the economic impacts of the Arizona portion of the Project, to incorporate updated conditions and assumptions. Two very important changes noted in the Report were increased generation resources in California, including a significant amount of renewable generation projects due to increased renewable goals; and reduced load forecasts, due to changed economic conditions and the success of energy efficiency programs. Accordingly, I had indicated to you that we did anticipate that the benefits of the Arizona portion of the Project to California consumers could be reduced from the level of benefits forecast at the time of SCE's initial filing for the Project.

We now have completed updating the economic analysis and it reveals that the benefits are indeed significantly lower as a result of recent developments. In fact, the analysis does not support refiling with the ACC, at this time, for authorization of the Arizona portion of the Project. As discussed below, however, SCE does intend to continue to review the anticipated renewable and non-renewable benefits that building DPV2 would provide to both Arizona and California. If the required interconnection studies establish the need for new transmission in western Arizona to interconnect generation resources into the California Independent System Operator ("CAISO") system, we will again seek ACC approval of necessary transmission. In

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pedro.pizarro@sce.com

the meantime, SCE will continue to pursue the California portion of the Project, which is needed to interconnect generation resources in the Blythe area. SCE will cease the current pre-filing activities at the Federal Energy Regulatory Commission. While SCE is not able to proceed immediately with permitting the Arizona portion of the Project, we are committed to find a way to do so if further analysis supports the approach.

The following four factors explain the significant reduction in economic benefits to California customers of constructing the Arizona portion of the Project:

- **Anticipated Renewable Generation Developments:** The development of renewables in California, caused in part by California policymakers' focus on increasing RPS to 33% by 2020, will decrease the need for imports and thus, the economic benefits to California of the Arizona portion of the line.
- **Generator Interconnection Requests in California, including at Midpoint Switchyard:** The development of both conventional and renewable generation, which will connect to the California portion of the Project at the proposed Midpoint Switchyard, lessens the need for imports from the Southwest.
- **Projected Changes in Future Fuel Prices:** As a result of changed fuel price forecasts, the expected differential in power prices between California and the Palo Verde Hub has decreased, lowering the value of imports.
- **Changed Economic Conditions:** Reduced load growth in California has reduced the need for and benefits of imports. Higher levels of energy efficiency and distributed generation in California are expected to also reduce future load growth.

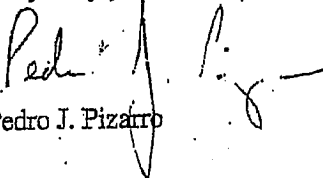
This analysis reveals that the Arizona portion of the Project today cannot be justified as an economic investment funded by California consumers. However, currently four renewable generators in western Arizona, totaling 2,950 MW, have requested interconnection to the CAISO grid. As noted above, SCE will continue to study current and future requests for interconnection in the CAISO control area. SCE anticipates that the next round of studies will be completed in April 2010. If these studies, or subsequent ones, establish the need for new transmission in western Arizona to interconnect generation resources into the CAISO system, SCE will seek authorization from your Commission and other applicable agencies to construct the necessary transmission.

Thank you for providing ongoing support and the opportunity for parties to evaluate the Arizona portion of the Project. SCE also appreciates the time and effort of the Arizona participants in the Meet and Confer process and the ACC's support of that process. SCE hopes that the results of that process will be useful as the ACC considers the possibility of pursuing transmission needs in the western United States.

Chairman Kristin K. Mayes
May 15, 2009
Page 3

SCE will be prepared to discuss this matter further with the ACC at the May 19 Special Open Meeting.

Very truly yours,


Pedro J. Pizarro

cc: Commissioner Gary Pierce
Commissioner Paul Newman
Commissioner Sandra D. Kennedy
Commissioner Bob Stump
Janice Alward
Ernest Johnson
Lyn Farmer
Rebecca Wilder
ACC Docket Control

Attachment C

May 18, 2009, Letter to FERC on Withdrawal of Pre-Filing Request

Gary A. Morgans
1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202.429.6234
gmorgans@steptoe.com
Tel 202.429.3000
Fax 202.429.3902

May 18, 2009

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Southern California Edison Co.*, Docket No. PT08-1-000

Dear Ms. Bose:

I am writing to you regarding Southern California Edison Company's ("SCE") pre-filing request in the above-captioned docket. The pre-filing request pertains to the Arizona portion of the Devers Palo Verde 2 transmission line Project (the "Project"), and was filed with the Commission on May 16, 2008.

As SCE explained in its pre-filing request, SCE submitted the request as an initial step in securing a permit for the Arizona portion of the Project under Section 216 of the Federal Power Act. This followed the Arizona Corporation Commission's ("ACC") denial of a permit for the Arizona portion of the Project. At the time SCE submitted its request to the FERC, it was SCE's belief that the Arizona portion of the Project would provide important benefits to both California and Arizona. More recent studies, however, indicate that the economic benefits to California of constructing the Arizona portion of the Project are reduced significantly, primarily due to anticipated future renewable generation development, generator interconnection requests in California, projected changes in future fuel prices, and reduced load growth in California. This analysis reveals that the Arizona portion of the Project today cannot be justified as an economic investment funded by California consumers.

As SCE has previously advised the Commission, it has been SCE's preference that a resolution of the Project permitting issues be achieved with Arizona authorities that would enable the project to go forward on reasonable terms. To that end, SCE had been working with Arizona regulators to prepare a revised application for the Arizona portion of the Project. The updated economic analysis, however, does not support refiling with the ACC, at this time, for authorization of the Arizona portion of the Project. Accordingly, SCE hereby provides notice of withdrawal of its

pre-filing request with the Commission in this docket. SCE will continue to pursue the California portion of the Project, which is needed to interconnect generation resources in the Blythe, California area.

While SCE is not able to proceed immediately with permitting the Arizona portion of the Project, we are committed to find a way to do so if further analysis supports the approach. SCE will continue to study current and future requests for interconnection in the California ISO (“CAISO”) control area; including nearly 3,000 MW of requests that reside in western Arizona and which may necessitate the construction of high-voltage facilities to access these projects. SCE anticipates that the next round of studies will be completed in April 2010. Withdrawing the pre-filing request at this time will better enable SCE to dedicate the substantial resources that will be required for these important efforts. If these studies, or subsequent ones, establish the need for new transmission in western Arizona to interconnect generation resources into the CAISO system, SCE will seek authorization from the relevant agencies to construct the necessary transmission.

SCE would like to thank the Commission and its Staff for its assistance throughout the pre-filing process. We realize that the Commission’s Staff has devoted substantial resources and attention to this matter, and we greatly appreciate the efforts expended by the Staff in this regard.

Very truly yours,

/s/ Gary A. Morgans

Gary A. Morgans

Attorney for Southern California Edison Co.

cc: J. Mark Robinson, Director, Office of Energy Projects
Jeff C. Wright, Deputy Director, Office of Energy Project

Attachment D

Declaration of David Kay

DECLARATION OF DAVID KAY

I, David Kay, declare as follows:

1. I am the Southern California Edison Company's Manager of Environmental Projects. I have personal knowledge of the facts stated herein and if called as a witness, could and would competently testify thereto.

2. SCE's May 15, 2009, letter from SCE to the Commission states that following the Commission's approval of the Petition to Modify ("PTM"), SCE will proceed to complete the licensing work to obtain a Record of Decision ("ROD") from the Bureau of Land Management ("BLM"). At that time, SCE estimated the BLM effort to issue a ROD following re-initiation of consultation with the State Historic Preservation Officer ("SHPO") and the U.S. Fish and Wildlife ("USFWS") would likely be completed within three months.

3. Recent consultation with the BLM indicates that their completion of Federal Endangered Species Act consultation with the USFWS and the Programmatic Agreement consultation with the SHPO will take longer than the three months previously expected. Based on this updated information and by identifying the specific activities and durations SCE's permitting experts now estimate that issuance of the BLM's ROD will take six months.

4. In addition, SCE has extended its permitting schedule to include the BLM's issuance of the Notice to Proceed ("NTP"), which will take an additional six to eight months. In the six to eight months following issuance of the ROD, a number of additional tasks must be completed prior to issuance of the NTP including the preparation of numerous mitigation plans required by the Final Environmental Impact Report/Final Environmental Impact Statement; preparation of the Historic Properties Management Plan ("HPMP"); amendments to SCE's right-of-way grants and easements; and the preparation of project's Plan of Development ("POD"). All mitigation plans, the HPMP, amendments, and POD must be submitted and accepted by the BLM for issuance of the NTP.

Thus, it is likely that the BLM's NTP would not be issued until 12-14 months after a Commission decision on SCE's PTM.

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

Executed this 26th **day of June, 2009** at Rosemead, California.

/s/ David Kay

David Kay

Attachment E

Declaration of John E. Tucker

DECLARATION OF JOHN E. TUCKER

I, John E. Tucker, declare as follows:

1. I am a Project Manager in the Grid Interconnect and Contract Development Group of Southern California Edison Company's ("SCE"), Transmission and Distribution Business Unit and have held this position since March 1999. I have personal knowledge of the facts stated in Section III., "Information on the Status of Blythe Energy Project Phase I and II," and the facts stated in this declaration and, if called as a witness, could and would competently testify thereto.

2. SCE and the California Independent System Operator Corporation's ("CAISO") have received interconnection requests representing 4900 MW of new renewable generation, in addition to 1210 MW of new conventional gas-fired generation, in the Blythe Region as shown in the table below

Generation Interconnection Requests In The Blythe Region (MW) As of June 26, 2009	
Renewable	
Midpoint	2950
Julian Hinds-Eagle Mountain Area	1950
Total Renewable	4900
Conventional	
Midpoint	1210
Total Requests to Interconnect	
Midpoint (2950 + 1210)	4160
Julian Hinds-Eagle Mountain Area	1950
Total	6110 *
<p>*. This figure has been updated, since SCE filed its Amendment to Petition For Modification Of Decision No. 07-01-040 on September 2, 2008, to reflect the removal of interconnection requests for projects that elected not to proceed in the CAISO Transition Cluster and, consequently, were withdrawn from the CAISO interconnection queue. This figure does not include requests for interconnection to the Arizona portion of the Devers-Palo Verde 500 kV line. At this time, interconnection requests to the Arizona portion of Devers-Palo Verde 500 kV line received by the CAISO and SCE total approximately 2700 MW of renewable solar generation.</p>	

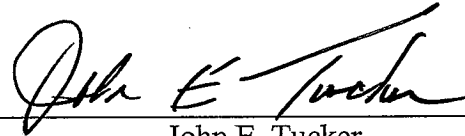
3. Since late 2007, renewable projects representing 2950 MW of generation, and conventional gas-fired generation representing 1210 MW have requested interconnection at the Midpoint Switchyard, and have met the requirements for maintaining a position in the CAISO queue. In total, active requests received by SCE and the CAISO as of June 26, 2009, to interconnect with the proposed Midpoint Switchyard equal 4160 MW.

4. Additionally, 1950 MW of new renewable power projects have requested interconnection in the Julian Hinds and Eagle Mountain area and have met the requirements for maintaining a position in the CAISO queue. This is an area in the desert approximately 50 miles from Blythe, California. The Julian Hinds Substation is located approximately twelve miles from the Eagle Mountain Substation.

5. The potential generation sources in the Blythe Region (other than the Blythe Energy Project Phase II) for the most part are in the early interconnection stages and, thus, specific project information beyond that required to perform interconnection studies is limited.

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

Executed this ^{25th} ___ day of June, 2009 at Rosemead, California.



John E. Tucker

Attachment F

Declaration of Gary Allen

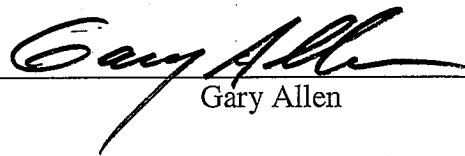
DECLARATION OF GARY ALLEN

I, Gary Allen, declare as follows:

1. I am the Southern California Edison Company's Manager of Strategic Planning for the Renewable and Alternative Power Department. I have personal knowledge of the facts stated in Section II.C., "Power Purchased Agreements Between SCE and Electricity Generation Developers"; 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 25 day of June, 2009 at Rosemead, California.



Gary Allen

Attachment G

Letters from Developers



Energy Solutions

Robert Y. Redlinger
Director
Renewable and
Distributed Energy

Chevron Energy Solutions Company
A Division of Chevron U.S.A. Inc.
345 California Street, 18th Floor
San Francisco, CA 94104-2624
Tel 415 733 4614
Fax 415 733 4639
rredlinger@chevron.com

November 10, 2008

Southern California Edison Company
2244 Walnut Grove Avenue
P.O. Box 800
Rosemead, CA 91770

Attention: Mr. Robert Lugo
Manager, Grid Interconnection and Contract Development

Dear Mr. Lugo:

Chevron Energy Solutions and its development partners are developing 1,750 MW of solar projects along the proposed Devers-Palo Verde 2 transmission corridor between Desert Center and Blythe. Environmental permitting for these projects is being initiated and is expected to be completed by the end of 2010. These projects are also moving through the transmission interconnection process in the transition cluster group.

We have been monitoring SCE's petition to modify the CPUC's Certificate of Public Convenience and Necessity (CPCN) for the Devers-Palo Verde #2 Project (D-PV2) with great interest. Our ability to expeditiously develop, enter into power purchase agreements and construct these solar projects is contingent upon the timely construction of the D-PV2 line and the Midpoint Substation. Without a clear timeline for completion of these transmission facilities, expeditiously moving forward with these projects would be premature due to the capital cost uncertainty attributable to potential project delays.

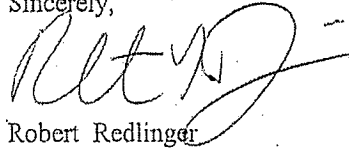
The clear benefit to proceeding with construction of the California portion of the D-PV2 line on the earlier schedule that SCE proposes is that it will provide an opportunity to build these solar projects sooner and consequently meet California's RPS goals sooner. With the high capital cost of solar projects, it is not economically viable to build these solar projects in advance to demonstrate a need for the transmission facilities. Consequently, delaying the construction of the D-PV2 transmission facilities result in corresponding delays to our solar project development efforts. Based on our current development schedules and assuming that we have near-term assurances, we could begin using the D-PV2 transmission facilities and the Midpoint substation by mid-2012. Note that this date is consistent with the proposed SCE schedule. Delaying construction of the D-PV2 facilities to meet the proposed DRA schedule would result in delaying our solar development efforts by a year or more.

Chevron Energy Solutions and its development partners are committed to help California meet its renewable portfolio standard goals. SCE and the CPUC can help make these projects a reality by

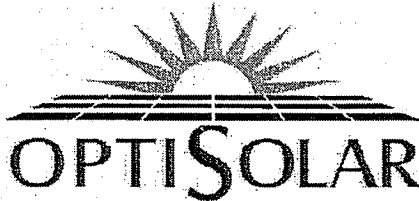
November 10, 2008
Page 2

providing a clear and timely indication that this essential transmission corridor will be in place to support rather than impede our development efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Redlinger", with a stylized flourish extending to the right.

Robert Redlinger
Director
Renewable and Distributed Energy



October 10, 2008

Southern California Edison
Attention: John Tucker
P.O. Box 800
Rosemead, CA 91770

Dear Mr. Tucker,

OptiSolar Inc. (OptiSolar) submitted a request to interconnect the 700 MW Desert Quartzsite Photovoltaic (PV) project (the Project) to the California Independent System Operator (CAISO) on November 1, 2007. The Project would interconnect to the proposed Midpoint Substation, and will be located on adjacent Bureau of Land Management (BLM) land in Riverside County, California. OptiSolar submitted a right-of-way application for the Project to the Palm Springs-South Coast Field Office of the BLM on September 27, 2007, and has entered into a Cost Recovery Agreement with the BLM for the National Environmental Policy Act review of the Project.

The Project's original interconnection request to the CAISO indicated that it would begin to deliver incremental quantities of power to the Midpoint Substation by the Proposed In-Service Date of June 30, 2010, as the Project's PV technology allows for it to be brought online in increments. The Project's full 700 MW of installed capacity was expected to have a full Commercial Operation Date of December 1, 2011. It is now expected that the Project's interconnection request will be studied as part of the Transition Cluster under CAISO's reformed Large Generator Interconnection Process (LGIP). The schedule for the reformed LGIP is currently expected allow for Interconnection Agreements for projects in the Transition Cluster to be executed by December 2010.


Assuming that OptiSolar can secure an Interconnection Agreement, a power purchase agreement, project financing, and all required permits for the Project no later than December 31, 2010, the Project could start construction in 2011 and begin to deliver clean, renewable solar electricity to the Midpoint Substation by December 1, 2011. Due to delays to date in the CAISO's interconnection process, the Project's full 700 MW of output would likely not be available for delivery to the Midpoint substation until 2012 or 2013.

Please let me know if you have any other questions about the Project. I can be reached at (510) 401-5817 or karbeit@optisolar.com.

Very truly yours,

Kathryn Arbeit, Director of Business Development

OPTISOLAR

31302 Huntwood Avenue  Hayward, California 94544
Phone: 510.401.5800 Fax: 510.401.5859

www.optisolar.com

October 30, 2008

Mr. Robert Lugo
Manager, Grid Interconnection and Contract Development
Southern California Edison Company
2244 Walnut Grove Ave.
Rosemead, CA 91770

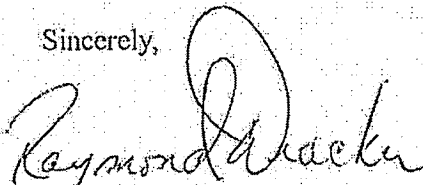
Dear Mr. Lugo:

Solar Millennium has been following SCE's petition to modify the CPUC's Certificate of Public Convenience and Necessity (CPCN) for the Devers Palo Verde #2 Project (DPV2) with great interest. The timely permitting and construction of the DVP2 line and the Midpoint Substation are essential to Solar Millennium's ability to develop a series of 250 MW solar thermal projects near Blythe and Desert Center, California.

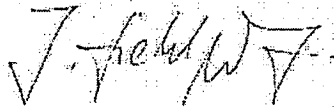
The uncertainty surrounding DVP2 including the changing timeline, location of Midpoint substation and other potential substations along the DVP2 is an impediment to the timely development of Solar Millennium's projects and leads to great uncertainty to the soundness of our on-going investments in developing these sites. This has been compounded by delays due to the new transmission cluster process. Any further delay in the permitting and construction of the DPV2 will serve only to delay and impede the financing of these projects, their general development progress and will impact Solar Millennium's ability to meet its obligations to utility customers and may lead to losses.

Solar Millennium needs near-term assurances that DVP2 will be completed by mid-2012. Postponement will only serve to increase the costs of the DVP2 and jeopardize the development of these and other solar projects. Keeping the existing schedule is the best way to assure that this essential transmission corridor will be in place to make these projects a reality and enable California to meet its RPS goals.

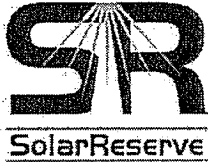
Sincerely,



Raymond Dracker
Senior Vice President



Josef Eichhammer
Managing Director



October 31, 2008

Mr. Robert Lugo
Manager, Grid Interconnection & Contract Development
Southern California Edison Company
2244 Walnut Grove Ave.
Rosemead, CA 91770

Subject: Support for SCE's Petition to Modify the Certificate of Public
Convenience and Necessity for Advancement of the Devers-Palo Verde
#2 Transmission Line

Dear Mr. Lugo:

SolarReserve, LLC appreciates the opportunity to provide comments with regard to the subject issue as part of the California Public Utility Commission process. SolarReserve is a Santa Monica, California based energy company formed by US Renewables Group, a private equity firm focused exclusively on renewable energy. SolarReserve holds the exclusive worldwide license to develop solar plants that use equipment manufactured by United Technology Corporation's subsidiary, Hamilton Sundstrand, through its Rocketdyne division. Rocketdyne, the US Department of Energy, and others have invested more than \$100 million invested to date in the design and manufacture of these components. SolarReserve is currently developing a portfolio of opportunities to deploy solar energy plants in the United States, Europe, Africa, the Middle East, Latin America and Australia.

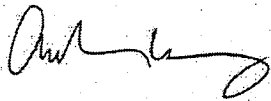
SolarReserve supports Southern California Edison Company's Petition to Modify (PTM) its Certificate of Public Necessity and Convenience (CPCN) regarding construction of the California segment of the Devers-Palo Verde #2 (DPV2) high voltage transmission line.

The Mojave Desert area around Blythe, California is rich in renewable solar resources. SolarReserve currently has 12 projects in the interconnection queue, half of which are proposed to interconnect at the planned Midpoint substation. Due to the uncertainty associated with the timing of implementation for the incremental DPV2 transmission capacity, we are currently postponing development plans for certain projects in this area. Increased certainty over the construction timeline for a new transmission line in this geographically strategic area for renewable energy will enable developers to proceed with project development in a parallel process with construction of new transmission. Delaying construction of new transmission will, conversely, delay the development process for otherwise viable renewable energy projects also proposing to interconnect at Midpoint substation.

SolarReserve believes a lead time of five to eight years may be required to permit, finance, and construct a project in California before it is ready to deliver clean renewable energy to the grid. During this period, a developer carries substantial monetary risk. Obtaining a viable transmission interconnection is one of the earliest key milestones in the development process since it represents a key area of development risk and must be established before a project proponent invests millions of dollars in permitting efforts. SolarReserve suggests that postponing final approvals and perpetuating the uncertainty around construction of the DPV2 line will either lead developers to delay development plans in this area or focus their development resources elsewhere. SolarReserve further contends that a reduced level of wholesale competition will not benefit SCE's ratepayers and shareholders, especially if projects in less rich renewable areas in the Western states are utilized to meet RPS requirements.

If you have questions, please contact me at (310) 315-2225 or andrew.wang@solar-reserve.com. We appreciate the opportunity to provide our comments on this proceeding.

Sincerely,



Andrew Wang
Senior Development Manager
SolarReserve, LLC
www.solar-reserve.com



"Bob Mooney"
<bob@pmalfc.net>
10/31/2008 02:00 PM

To: <Robert.Lugo@sce.com>
cc: <John.Tucker@sce.com>, <rlooper@spellc.com>, "Jake Stephens"
<jstephens@greensunenergy.com>
Subject: DPV2 Petition to Modify

Blythe Solar 1 and Blythe Solar 2 are solar projects near the proposed Midpoint station. The projects are 49.5 MW each and as such only require Riverside County permitting. The projects are being developed with a 2011 to 2012 completion, equipment and transmission permitting. The completion of the California only portion of DPV2 is being relied on to make investments at this time. A hypothetical later date such as 2013 based on ACC or FERC action would cause development to stop until certainty of the transmission solution were obtained.

Thank you for the opportunity to comment. Blythe Solar 1 and 2 support the petition to modify as amended.

Bob Mooney
US Solar (Owner of Blythe Solar 1 and 2)



"Robert Looper"
<rlooper@spellc.com>

10/31/2008 03:21 PM

To: <John.Tucker@sce.com>
cc: "Bob Mooney" <bob@pmiallc.net>
Subject: DPV2 Petition to Modify

Caithness Blythe II is a 570 MW fully permitted combined cycle power plant approved to interconnect at Midpoint Station. The project will not go forward without the Midpoint Station in place. The project is scheduled for a late 2011 or early 2012 completion. Caithness Blythe II believes that the California portion of DPV2 should be constructed as proposed in the petition to modify with the Arizona portion to follow once the appropriate approvals are obtained. Avoiding resource deficiencies in SP 15 rests on outcome of completing the California portion of the line.

Thanks for the opportunity to comment.

Robert Looper
Senior Vice President – Caithness Energy, LLC
1015 W. Hays
Boise, ID 83702
208-331-1898 (Office Phone)
208-343-1218 (Fax)
208-870-5371 (cell)
rlooper@spellc.com



"Bob Mooney"
<bob@pmallc.net>

10/31/2008 02:31 PM

To: <Robert.Lugo@sce.com>
cc: <John.Tucker@sce.com>, <rlooper@spellc.com>
Subject: DPV2 Petition to Modify

Caithness Blythe III is a 640 MW fast start combined cycle power plant with an interconnect request to Midpoint Station. The project will be located on the Blythe II site. The project will not be submitted to the California Energy Commission for licensing until a transmission solution is assured for the Blythe area. Therefore it is critical that a time certain as proposed in the petition to modify for the California portion of DPV2 be put in place this year.

With the delays of projects in South Coast Air District due to litigation, this project located in Mohave can move forward to meet SP-15 needs—but only with a commitment to complete the California portion of DPV2 by 2012.

Thank you for the opportunity to comment.

Bob Mooney
Caithness Energy

BullFrog



GREEN ENERGY LLC

October 31, 2008

Mr. Robert Lugo
Southern California Edison Company
Manager, Grid Interconnection & Contract Development
2244 Walnut Grove Ave.
Rosemead, CA 91770

Subject: SCE's Petition to Modify the CPUC's CPCN for the DPV2 Project to Advance Construction of the California Portion of DPV2, including Midpoint Switchyard

Dear Mr. Lugo,

This correspondence is regarding SCE requests to provide written comments expressing our many concerns we have regarding the possible delay in service schedule of the DPV2 project.

Bull Frog Green Energy (BFGE) applied into the CAISO's "Transition Cluster" with an application for interconnection for 245 MW of clean, green solar energy in late May this year. As part of the application, it was made clear to us that the in service, or Commercial Operation date, was to be a hard time limit, therefore, we ventured to begin our permitting process in a vigorous fashion. Our decision to pour money and man-power into this project was also predicated upon us being included in the RETI process and having our point of interconnection assigned a pretty low risk factor. Knowing that the approval of SCE's PTM was eminent, it was reasonable to assume that our renewable generation in the Blythe-area could be constructed and ready to connect to the Midpoint Switchyard by or near the end of 2011.

The opposition to the Devers-Palo Verde line(s) via the proposed Midpoint Switchyard by the California Public Utilities Commission's (CPUC) Division of Ratepayer Advocates' (DRA) to SCE's request to proceed with construction of the California portion of its proposed Devers-Palo Verde #2 project (DPV2) is extremely bad news to us, as we not only are on track to be interconnected to that line by the 2011 deadline, but it also impacts our new, yet to be submitted Application for Interconnection for an additional 245 MW of solar power on the same line and Midpoint Substation.

As discussed during the scoping meeting for our proposed project, SCE has received a Certificate of Public Convenience and Necessity (CPCN) from the CPUC for the DPV2 project. Also, as we discussed, the Arizona Corporation Commission (ACC) denied that portion of DPV2 that would be constructed in Arizona. SCE has

BullFrog



GREEN ENERGY LLC

appealed the ACC decision and is currently investigating ways to increase DPV2 benefits to Arizona such that the ACC will ultimately approve the Arizona portion of DPV2. SCE is also pursuing the backstop siting authority afforded the Federal Energy Regulatory Commission (FERC), and is currently in the pre-filing phase at FERC, if needed. However, it is SCE's priority and preference to resolve the Arizona-related DPV2 issues with the state of Arizona. Having this situation resolved would also improve our position to install more solar power in the area on the DPV2 line in Arizona.

SCE has informed us that with approval of the Arizona portion of DPV2 being delayed, and given the numerous interconnection requests for conventional and renewable generation in the Blythe area proposing to connect to the proposed Midpoint Switchyard, SCE has filed a petition to modify (PTM) the CPUC's DPV2 CPCN. In its PTM, SCE is seeking approval from the CPUC to commence and complete construction of the California portion of the DPV2 project, including the Midpoint 500kV Switchyard, prior to receiving approval for the Arizona portion of the project from either the ACC or FERC. Under the PTM, the California portion of DPV2 would terminate at Midpoint Switchyard, with the existing Devers-Palo Verde #1 line being looped into Midpoint Switchyard as well. The additional Arizona facilities would only be constructed following approval by the ACC or FERC.

SCE further informed us that in response to SCE's PTM (as amended), on October 2, 2008, the DRA opposed the advanced construction of the California portion of DPV2 on the basis that, among other things, the DRA believes there appears to be no practical benefit to an earlier online date (sooner than June 2013) for the California portion of DPV2. The DRA states that "it is not apparent that the benefit of early access to Blythe-area renewable resources actually would be realized." According to the regulatory and construction timeline SCE included in its response to DRA's data request, the interconnection agreements for the "transition cluster" renewable resources would be executed at the end of 2010, while the California-only segment of DPV2 would come online at the end of 2011. It would be difficult, if not impossible, for a meaningful amount of Blythe-area renewables projects to commence and complete construction and become operational within this twelve-month timeframe. Practically speaking, there just does not appear to be any benefit to a California-only project."

It is BFGE's position the Blythe-area developers, such as ourselves, can indeed get our proposed solar power plants on line in the Blythe-area on schedule, however, ONLY under the assumption that DPV2 and Midpoint Switchyard would be in-service by the end of 2011. If the PTM is not approved now by the CPUC and SCE is forced to wait for either ACC or FERC approval, then we could be delayed until mid 2013.

Bull Frog

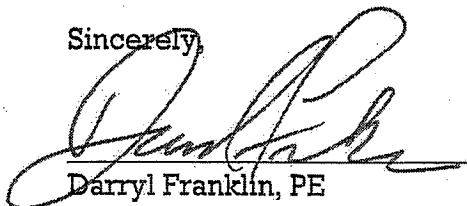


GREEN ENERGY LLC

BFGE currently has a project within the CAISO's transition cluster and is expected to know its interconnection costs, including its proportionate share of network upgrade costs by September 2009. Based on that timeline, BFGE believes that it is reasonable to assume, that if we have received our required permits, that we could commence and complete construction of our generating facility by or near the end of 2011. We have expressed to SCE that they have not been able to provide us with any assurance as to the in-service date for DPV2 and whether or not Midpoint Switchyard will be funded as part of DPV2. This lack of assurance has, and will, continue to result in an unfortunate postponement of the in-service dates of our renewable projects in the Blythe area. However, with timely CPUC approval of SCE's PTM for DPV2, this situation can still be rectified.

In conclusion, BFGE has spend a great deal of money to bring solar power to California, a state where we all live and we want to see less reliance on foreign oil, more reliance on our own energy independence and a much cleaner environment. If this transmission line is not constructed on the original schedule, this will only further delay Governor Schwarzenegger's goal, our goal, of achieving a 33% renewable energy portfolio standard by 2020.

Sincerely,



Darryl Franklin, PE

Principal

Bull Frog Green Energy, LLC

dfranklin@bullfroggreenenergy.com

619-987-1886

Attachment H:

Declaration of Dana Cabbell

DECLARATION OF DANA CABELL

I, Dana Cabbell, declare as follows:

1. I am the Southern California Edison Company's Manager of Transmission Intertie Planning. I have personal knowledge of the facts stated in Section II., "Information on CAISO's Approval of the California-only Project"; 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 25 day of June, 2009 at Rosemead, California.



Dana Cabbell

Attachment I

June 19, 2009, Letter from California ISO

Re: Conditions for ISO Agreement to Construction of California Portion of DPV2



June 19, 2009

The Honorable Victoria S. Kolakowski
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Via Electronic and US Mail

Re: Conditions for ISO Agreement to Construction of California Portion of
Devers-Palo Verde No. 2 Transmission Project (A.05-04-015)

Dear Judge Kolakowski:

The California Independent System Operator Corporation has reviewed Southern California Edison Company's request that the California Public Utilities Commission approve construction of the California portion of the Devers-Palo Verde No. 2 transmission project. The ISO's review is based on the description in SCE's amended petition for modification filed in this proceeding on September 2, 2008, as revised pursuant to SCE's letter of May 15, 2009 to the Commission.

In its letter, SCE indicated that circumstances have changed, affecting the economic benefits previously identified for this project. As a result, SCE has requested approval to construct the portion of the project that terminates at a new "Midpoint" substation in California in the Blythe area near the Colorado River. The ISO recognizes the complexity associated with responsible decision making regarding long-term projects like this one and commends SCE for its reexamination of the project and the updated evaluation of benefits.

The ISO has reviewed the proposed California portion of the project and takes this opportunity to advise the Commission of the evaluation the ISO will undertake in determining whether to agree that construction of this portion of the project is necessary infrastructure to interconnect generating facilities currently in the ISO's interconnection queue.

The ISO's governing board approved the construction of the original version of the Devers-Palo Verde No. 2 transmission project in 2005 based on the economic and reliability benefits and operational flexibility of the project. The ISO subsequently provided a letter to the Commission, dated June 12, 2008, in which the ISO advised that

its governing board's approval encompassed a phased project development, commencing with the project facilities located in California. In that letter, the ISO urged the Commission to authorize SCE to construct the project facilities in California. The ISO's position was based on SCE's commitment to obtain approval for the Arizona portions of the project and the ISO's previous evaluation of the original project.

As SCE is currently only requesting approval of the proposed project facilities in California, the economic justification for the project expressed in the ISO's June 12, 2008 letter is no longer applicable. Nevertheless, the California portion of the project continues to provide operational and reliability benefits, and the ISO has identified the anticipated need for the project as a generation interconnection facility, which provides the basis for the ISO's agreement to the construction of the California portion of the project, should the requirements below be met.

The ISO is responsible for studies to determine the facilities needed to interconnect a new generating facility to the transmission system under the ISO's operational control. At the conclusion of the interconnection study process, the ISO is required by Section 11 of Appendices U and Y of the ISO tariff to enter into a Large Generator Interconnection Agreement (LGIA) for the generating facility. The LGIA is required to describe the facilities to be constructed to interconnect the new generating facility, including any necessary upgrades to the transmission system, and the responsibility for the costs of these facilities.

The ISO anticipates that the California portion of the project will be an important facility in furtherance of state goals regarding the long-term acquisition of power from renewable energy resources. The ISO's queue for requests for interconnection in the Blythe area near the proposed new Midpoint substation contains eleven requests for interconnection of proposed renewable resource generating facilities, totaling 4900 megawatts (MW). The ISO's studies show that the California portion of the project, along with additional complementary upgrades that could be built in later stages (depending on the number of renewable generating facilities ultimately developed), are the most effective means by which to deliver the generation from these proposed new facilities to load in California. In addition, there are interconnection requests in the ISO's queue for 1210 MW of proposed new conventional gas-fired generation in the Blythe area, resulting in a total of 6110 MW of interconnection requests for the Blythe area.

The discussion below focuses on the two main elements of the California portion of the project: the Midpoint substation, and the Midpoint-Valley transmission line.

Midpoint substation

The ISO's studies continue to indicate that a new Midpoint substation is needed for any new generating facility requesting to interconnect to the existing Devers-Palo Verde No. 1 line in the Blythe area. Based on the ISO's interconnection studies, this new

substation will be identified as a needed facility connecting to the Devers-Palo Verde No. 1 line for the first project to reach the point of executing an LGIA. The substation is also a critical element for interconnection to the California portion of the proposed Devers-Palo Verde No. 2 transmission line.

Midpoint to Valley transmission line

The ISO has studied the impacts on the transmission system of the new generating facilities proposing to interconnect to the existing Devers-Palo Verde No. 1 line in the Blythe area near the Colorado River. The ISO's studies have determined that the interconnection of 1030 MW of new full capacity generating facilities to the Devers-Palo Verde No. 1 line in the Blythe area near the Colorado River would trigger the need for construction of the new Midpoint to Valley transmission line in order for the generation from those facilities to be fully deliverable.

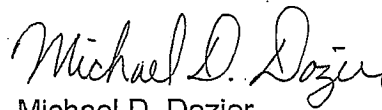
Based on this assessment, the ISO would agree to construction of the California portion of the project that includes a second line from Midpoint substation to Valley substation once the following have occurred:

- (1) any combination of the following have occurred for requests for interconnection to the Devers-Palo Verde No. 1 line in the amount of at least 1030 MW of full capacity generating facilities:
 - (a) LGIAs have been executed by generating facility developers, SCE, and the ISO pursuant to Section 11 of Appendix U or Y of the ISO tariff; or
 - (b) the ISO has received the initial posting of interconnection financial security by generating facility developers pursuant to Section 9.2 of Appendix Y (subject to Section 6 of Appendix 2 of Appendix Y) of the ISO tariff; and
- (2) the ISO has completed the interconnection studies for the plan of service for at least one of those proposed generating facilities in which the California portion of the proposed Devers-Palo Verde No. 2 project, including the new Midpoint to Valley line, has been identified as needed network upgrade facilities to accommodate that generating facility, pursuant to Section 8 of Appendix U or Section 7 of Appendix Y of the ISO tariff, and
- (3) an LGIA has been executed by a generating facility developer, SCE, and the ISO pursuant to Section 11 of Appendix U or Y of the ISO tariff in which the California portion of the proposed project, including the new Midpoint to Valley line, has been identified as needed network upgrade facilities to accommodate the generating facility for which the LGIA has been executed.

The Honorable Victoria S. Kolakowski
June 19, 2009
Page 4

If you have any questions or would like the ISO to elaborate on any of its findings,
please let me know.

Sincerely,

A handwritten signature in black ink that reads "Michael D. Dozier". The signature is written in a cursive style with a large, prominent "M" and "D".

Michael D. Dozier
Senior Counsel

cc: Service list for A.05-04-015

Attachment J

Declaration of Anjan Ghosh

DECLARATION OF ANJAN GHOSH


I, Anjan Ghosh, declare as follows:

1. I am the Manager of Cost Estimating Group supporting the Project Management Organization at SCE. My primary responsibilities include estimating SCE's capital projects, including substation (work inside substation fence lines) and major transmissions lines (220kV and 500kV).

2. I have a Bachelors of Science degree in Civil Engineering from Jadavpur University in India (1976), a Masters of Science degree in Structural Engineering from University of Manitoba in Canada (1978), and a Masters of Business Administration in Finance and Accounting from Louisiana State University (1981). In 1981, I joined Time Warner as a Financial Analyst, and subsequently was promoted to Controller of their Engineering and Construction Group. In December/January 1988/1989, I left Time Warner and joined Bechtel Engineering, where I worked in the areas of cost engineering and cost estimation from 1989-1997. I joined SCE in 1997 where I have worked for about twelve years in the areas of cost engineering and cost estimating.

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

Executed this 25th day of June, 2009 at Rosemead, California.


Anjan Ghosh

Attachment K

**DPV2's 2005 Constant Dollar Estimate Escalated
to 2008 and 2009 Constant Dollars**

**DPV2's 2005 Constant Dollar Estimate Escalated to 2008 and 2009 Constant Dollars
Using TDBU's General Escalation Rates ^{1/}, ^{2/}
(All Values in Millions)**

Project Segment	2005 Constant Dollar Preliminary Estimate Approved in D.07-01-040	Escalated to 2008 Constant Dollars	Escalated to 2009 Constant Dollars
Devers-Valley No. 2	\$90	\$106	\$112
Devers to the California Border (without Midpoint)	\$267	\$315	\$333
California Border to the Harquahala Junction	\$188	\$222	\$235
Total ^{3/}	\$545	\$643	\$680

Notes:

^{1/} Based on 1st Quarter 2008 & 2009 general escalation factors respectively, as published by TDBU's Budget Planning and Financial Management group using Global Insight historical (2006) and forecast (2007 and 2008) data from "Power Planner" Third Quarter 2007.

^{2/} General escalation rates are not specific to the cost of a project and, therefore, should not be used to estimate the cost of a specific project. For example, these \$2008 escalated values do not include additional costs due to the mitigation measures or unknown conditions specific to the project, do not include allowances for U.S. dollar exchange rates, or commodity and labor increases specific to the project.

^{3/} Total includes Direct Costs with Contingency, P&B, and A&G. It does not include AFUDC. (See D.07-01-040, Ordering Paragraph No. 10.)

^{4/} The DPV2 project expenditure forecast of \$774 million in 2008 10Q is a forecast of expense for the DPV2 Project for the period 2009 through 2013, and they are expressed in nominal dollars, whereas the numbers stated above in the tables are in constant dollars and are for the entire project cost.

Attachment L

Summary of California Portion of 2009 Constant Dollars

**Summary of California Portion Only
2009 Constant Dollars (In Millions)**

Description	Amount
Devers-Valley No. 2	\$112,628,000
Devers-California Border (without Midpoint)	\$333,137,000
Midpoint Switchyard	\$106,343,000
Less: ^{1/} Midpoint-California/Arizona Border (15 miles of Transmission Line)	\$(25,817,000)
Total DPV2 California Portion Only	\$526,291,000
Alligator Rock North of Desert Center	\$10,334,000
Total DPV2 California Portion Only with Alligator rock	\$536,625,000
Notes:	
^{1/} This reduction is for elimination of 15 miles of Transmission line from Midpoint Switchyard to Arizona border that was in the estimate of \$333,137,000 for “Devers-California Border without Midpoint” and \$106,343,000 “Midpoint Switchyard”.	
^{2/} Total includes Direct Costs with Contingency, P&B and A&G. It does not include AFUDC.	

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 **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUPPLEMENTAL INFORMATION ON 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 26th day of June 2009, at Rosemead, California.

/s/ Robin L. Taylor

Robin L. Taylor, Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770



California Public Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A0504015 - EDISON - CPCN CONCR
FILER: SOUTHERN CALIFORNIA EDISON COMPANY (U338E)
LIST NAME: LIST
LAST CHANGED: JUNE 22, 2009

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