

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

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

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

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**  
**ON THE PROPOSED DECISION OF ALJ KOLAKOWSKI**

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Dated: [October 26, 2009](#)

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

In the Matter of the Application of SOUTHERN )	
CALIFORNIA EDISON COMPANY (U 338-E) for )	
a Certificate of Public Convenience and Necessity )	Application No. 05-04-015
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Transmission Line Project. )	
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**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
ON THE PROPOSED DECISION OF ALJ KOLAKOWSKI**

Pursuant to Commission Rule 14.3(d), Southern California Edison Company (“SCE”) replies to the comments of the Division of Ratepayers Advocates (“DRA”) on the September 28, 2009, Proposed Decision (“PD”) of Administrative Law Judge Kolakowski.

**I.**

**DRA COMMENTS VIOLATE THE COMMISSION’S RULES**

Commission Rule 14.3(c) states that, “Comments shall focus on factual, legal, or technical errors and in citing such errors shall make specific references to the record or applicable law. Comments which fail to do so will be accorded no weight.” DRA’s comments fail to point out legal, technical, or factual errors in the PD.<sup>1</sup> DRA also reargues its position and introduces what is basically new testimony that not only is procedurally improper, but also factually incorrect. Because SCE’s reply comments are limited to five pages, SCE cannot address all the misstatements, but SCE addresses a few examples below.

First, DRA states that PD has absolutely no basis to make the assertion that this is a unique and unprecedented opportunity to construct a transmission line to support the Renewable Energy Transmission Initiative (“RETI”). DRA says that this is because the RETI Final Phase 1B Report contains no analysis of the California project.<sup>2</sup> DRA’s statements are incorrect. DRA admits that the RETI Phase 2A Draft Report made “certain assumptions” for the California portion of the DPV2 Project. In fact, the September 2009 Final RETI Phase 2A Report<sup>3</sup> analyzed the transmission needed to bring renewable power from the Competitive Renewable Energy Zones (“CREZs”) to load—including the California portion of DPV2 project—which includes the Devers-Valley portion of the project.<sup>4</sup>

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<sup>1</sup> DRA Comments, p.7.

<sup>2</sup> DRA Comments, p. 5 (“There is no analysis of a ‘California-only’ project.”)

<sup>3</sup> The September 2009 RETI Phase 2A Final Report is available at <http://www.energy.ca.gov/2009publications/RETI-1000-2009-001/RETI-1000-2009-001-F-REV2.PDF>.

<sup>4</sup> RETI Phase 2A Report, p. 3-72 to 3-73, p. 3-84, p. F-55, H-81, and H-82. The three segments are: Devers-Valley (segment 40); Devers-Desert Center (segment 35, representing a hypothetical collector substation), and segment 68, Desert Center to Colorado River (Midpoint Switchyard). As stated on page 3-72, “The Riverside Group, located in Riverside County, is comprised of three line segments. These link SCE’s proposed Midpoint 500 kV substation, a

Continued on the next page

DRA incorrectly states that the RETI Phase 2A Final Report relies on an estimate of \$361 million for the California-only project.<sup>5</sup> DRA asks, “What if the actual costs are consistent with the RETI estimate of \$361 million. Should the Commission be authorizing a maximum cost cap with \$325 million in wiggle room?”<sup>6</sup> The September 2009 RETI Phase 2A Report clearly indicates that the California portion of DPV2 includes the Devers-Valley No. 2 Transmission line,<sup>7</sup> and that the total cost of the California portion of DPV2 is \$490.8 million in 2008 dollars. This cost is close to the amount that SCE filed with the Commission (\$526 million in 2009 dollars):

“RETI Riverside Group (representing the California portion of the DPV2 Project) The total cost of the three RETI Riverside line segments is \$490.8 million (2008 dollars); while the cost of those segments filed with the CPUC is \$504.3 million (2008 dollars) and \$526 million (2009 dollars), again when calculated on a comparable basis, accounting for similar project elements.”<sup>8</sup> (Emphasis added.)

The RETI Phase 2A Final Report does not state that the cost for the California portion of the Project is \$361 million as DRA suggests. SCE suspects that DRA has omitted the costs for the Devers-Valley segment of the project, which the RETI Report estimated would cost \$130 million.<sup>9</sup>

Additionally, the Phase 2A Report at p. 3-85 provides a clear explanation for the small discrepancy—less than three percent—between the RETI Report estimate of \$490.8 million in 2008 dollars and the cost of the segments that SCE provided in the DPV2 proceeding (\$504.3 million in 2008 dollars and \$526.3 million in 2009 dollars).<sup>10</sup>

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proposed Desert Center 500 kV substation, and SCE’s existing Devers 500 kV substation. The proposed Midpoint substation is a component of the California portion of the Devers–Palo Verde single-circuit 500 kV line #2 (DPV2) project. The California portion of the DPV2 project also includes the Devers-Valley single-circuit 500 kV line #2 which is included under the ‘Delivery Group’ in the RETI Conceptual plan.”

<sup>5</sup> DRA Comments, p. 9.

<sup>6</sup> DRA Comments, p. 10.

<sup>7</sup> September 2009 RETI Final Report at p. 3-72.

<sup>8</sup> RETI Phase 2A Report, p. 3-84. Technically, the Report should indicate that the California portion is comprised on the RETI Riverside Group and Devers-Valley No. 2 transmission line, but the basic fact remains that it is stating that the cost of the California portion of the line – including Devers-Valley, is \$490.8 million.

<sup>9</sup> This is because footnote 31 of DRA’s comments cites only two of the three segments of the California portion of DPV2. DRA has probably omitted the cost of segment 40, which is the Devers-Valley segment of the project. In any event, the RETI Report clearly explains that the total cost of the California portion [the three segments are – segments 35, 68, and 40] is not \$361 million.

<sup>10</sup> September 2009 RETI Phase 2A Report, p.3-85 (“The reasons for these discrepancies are straightforward. RETI line segment costs are based on a generic set of standardized unit cost factors that include costs of existing line tear down, new line construction, line re-conductoring, and line termination at a fixed value of 25% for all line segments. RETI costs do not include cost for line relocation, multiplying factors for different ROW terrain considerations, land costs, Special Protection Schemes (SPS) and telecommunication modification costs and minor protection and control work costs. Conceptual-stage costs are by definition preliminary and are subject to wide margins of error. The costs included in the assessment summary do, however, provide a rough estimate of the relative investment required of the RETI transmission.”)

## II.

### **DRA’S COMMENTS REGARDING THE ADVICE LETTER SHOULD BE ACCORDED NO WEIGHT**

DRA states that SCE should not be authorizing a maximum cap with \$325 million in “wiggle-room” and suggests that PD is wrong in allowing SCE to update its costs by advice letter. As discussed above, the RETI Report contain cost estimates very similar to SCE’s cost estimates, as well as an explanation for the small differences between the two generic estimates.

Furthermore, the cost update process adopted by the Commission in D.07-01-040, which used the advice letter process to update cost once final engineering had been complete, is common practice, and was not opposed by DRA. However, in its comments on the PD, DRA is now challenging the process.<sup>11</sup> DRA’s comments should be accorded no weight.

## III.

### **DRA’S OTHER COMMENTS SHOULD BE ACCORDED NO WEIGHT**

DRA makes several other comments that misrepresent statements in the PD, or are so confusing that they should be ignored. For example, DRA states that it is not good decision-making for the PD to find that renewable resources are “too speculative” to warrant completion of a supplemental environmental impact report under CEQA, and yet find that the California portion of DPV2 has benefits.<sup>12</sup> DRA takes the PD’s statements out of context. As stated by the PD, the Commission’s Energy Division staff (“Staff”) directed its environmental consultant to develop an Addendum to the Final EIR/EIS. The Addendum lists the number of applications that the Bureau of Land Management has received for solar-voltaic facilities (totaling 127,561 acres) and the number of projects in the California Independent System Operator (“CAISO”) queue [5,860 MW (4,650 MW of renewable generation)]. It was in this context that the Addendum states that is unlikely that, given the large number of renewable projects that have been identified, all will be constructed; thus, as the potential generation sources are largely speculative,<sup>13</sup> they would not be considered a part of the project’s description or a connected action to DPV2 under CEQA.

There is nothing legally, technically, or factually incorrect with the Staff’s analysis on this issue, or the PD agreement with the Staff’s analysis. SCE provided a similar analysis in uncontested filings stating that CEQA does not require that the scope of the “project” include related actions that are only in the

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<sup>11</sup> See D.07-04-040 at pp. 44-45.

<sup>12</sup> DRA Response, p. 8.

<sup>13</sup> Final EIR/EIS Addendum, p. 6.

preliminary or planning stage.<sup>14</sup> DRA's comments on CEQA issues are incorrect and should be accorded no weight.<sup>15</sup>

#### IV.

#### **THE COMMISSION'S ENERGY DIVISION SHOULD MONITOR COMPLIANCE**

DRA recommends the record remain open pending: CAISO approval of the project by the Board of Directors; an environmental analysis that does not consider renewable generation to be speculative; and a reasonable cost estimate of the California portion of DPV2.<sup>16</sup>

There is no need for this proceeding to be held open. SCE's understanding is that the Commission's Energy Division traditionally determines compliance with Commission decisions, including whether its conditions have been met, and whether it is appropriate to grant waivers if such is consistent with the Commission's intent.

For example, the Commission's Executive Director of the Energy Division shall supervise and oversee the construction of the DPV2 Project, insofar as it relates to monitoring and enforcement of adopted mitigation measures [D.07-01-041, Ordering Paragraph No. 22]. SCE's understanding is that that Energy Division's director would oversee compliance with the cost update [via Advice Letter], and the CAISO approval [via the notice process established in the PD to provide the Commission information on the status of the interconnection queue and interconnection agreements], as well as all other environmental issues related to mitigation [as required by D.07-01-040, Ordering Paragraph No. 22].

As is traditional Commission practice, SCE's understanding is that Energy Division would be responsible for monitoring and enforcement, and would determine whether SCE had complied with the Commission's condition regarding CAISO approval. Thus, for example, SCE agrees with the October 19, 2009, Comments by the CAISO that Board approval is not required. SCE understands further that the Commission's approval of the CPCN is conditioned on CAISO's approval of DPV2, using whatever process and standards that the CAISO believes to be appropriate. However, ultimately, the Energy Division would determine whether the condition had been substantially met, and may also grant waivers for minor variances.

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<sup>14</sup> SCE September 2, 2009 Supplement. And the Commission recently stated, CEQA does not require an agency to quantify specific amounts when the results are speculative and uncertain. (See, Decision No. 09-07-024 [Sunrise], August 4, 2006; citing *Lake County Energy Council v. County of Lake* (1977) 70 Cal.App.3d 851, 854-855.

<sup>15</sup> DRA's Response indicates that they do not normally weigh in on CEQA issues. DRA Response, p. 8. This is because the CEQA issues are normally under the purview of the Energy Division. DRA should defer to the Staff on these issues, rather than challenge their analysis on the PD.

<sup>16</sup> DRA Response, p. 2.

V.

**CONCLUSION**

DRA's comments violate the Commission's rules and are based on errors. They should be accorded no weight. SCE asks that the Commission now issue the PD with the corrections suggested by SCE in its comments submitted on October 19, 2009.

Respectfully submitted,

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October 26, 2009

**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 **REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PROPOSED DECISION OF ALJ KOLAKOWSKI** 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 **26<sup>th</sup> day of October, 2009**, at Rosemead, California.

/s/ Meraj F. Rizvi

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