

**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)

**COMMENTS OF THE SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**  
**ON THE PROPOSED DECISION OF ALJ KOLAKOWSKI**  
**MODIFYING DECISION NO. 07-01-040 ON**  
**THE DEVERS-PALO VERDE NO. 2 TRANSMISSION LINE PROJECT**

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Dated: [October 19, 2009](#)

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DECISION NO. 07-01-040 ON THE DEVERS PALO VERDE NO. 2  
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Pursuant to Rule 14.3 of the California Public Utilities Commission’s (“Commission”), the Southern California Edison Company (“SCE”) comments on the September 28, 2009, Proposed Decision (“PD”) of Administrative Law Judge (“ALJ”) Kolakowski, in Application No. (A.) 05-04-05. As required by the Commission’s rules, SCE comments on areas where there are legal, technical, and factual errors in the PD, and suggests appropriate modifications to the language of the PD, as shown in Appendix A.

**I.**

**THE PROPOSED DECISION’S CHARACTERIZATION OF SCE’S MAY 15, 2009,  
LETTER SHOULD BE CLARIFIED**

The PD states that SCE informed the Arizona Corporation Commission (“ACC”) that SCE would no longer pursue authorization to construct the Arizona portion of DPV2.<sup>1</sup> SCE’s May 15, 2009, letter said that SCE was not able to proceed “at this time,” and explained the

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<sup>1</sup> PD, p. 10.

circumstances under which it may do so in the future [based on further interconnection studies].<sup>2</sup> To more accurately reflect the statements made in SCE’s May 15, 2009, letter, SCE requests the modifications shown in Appendix A be made to the PD on pp. 5, 10, and Finding of Fact No. 8 on p. 27.

## II.

### **THE PROPOSED DECISION SHOULD CORRECTLY REFLECT SCE’S STATEMENTS REGARDING PUB. UTIL. CODE SECTION 399.2.5**

The PD states that SCE has not expressly asserted that the California portion of DPV2 is necessary to meet California’s Renewable Portfolio Standard (“RPS”) and that SCE has not requested approval of the California-only project pursuant to Section 399.2.5.<sup>3</sup>

SCE stated that it was not requesting that the Commission authorize cost recovery in retail rates [under Pub. Util. Code Section 399.2.5(b)(4)].<sup>4</sup> SCE, however, is not waiving its statutory right to seek such recovery in the future. If such is required, SCE fully understands that it will need to show applicability and reasonableness to be granted this authority. Under Pub. Util. 399.2.5(b)(4), the Commission shall allow prudently incurred costs not approved for recovery in [Federal Energy Regulatory Commission (“FERC”)] general transmission rates to be recovered in retail rates, if the new facilities facilitate RPS goals.

As stated in SCE’s filings, SCE expects that it will be able to recover the costs of the California portion of DPV2 through FERC-jurisdictional transmission rates. DPV2 will be looped into the Devers-Palo Verde No. 1 Transmission Line (“DPV1”) at the Midpoint switchyard. As such, the California portion of DPV2 will become a part of the SCE transmission

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<sup>2</sup> The May 15, 2009, letter states that there currently, four large solar generation projects in Western Arizona that have requested interconnection to the California Independent System Operator (“CAISO”) grid. If future interconnection studies establish the need for new transmission in western Arizona, SCE will seek authorization from the applicable agencies to construct the necessary transmission.

<sup>3</sup> PD, p. 15.

<sup>4</sup> September 2, 2008, Amendment, p. 20.

network and the CAISO grid.<sup>5</sup> Because the California portion of DPV2 will be “used and useful” network facilities, there is a high probability that FERC will allow cost-recovery in general transmission rates. Therefore, SCE did not request that the Commission authorize cost recovery in retail rates under Pub. Util. Code Section 399.2.5(b)(4), but it reserves its statutory right to do so in the future.

The PD’s statement that SCE has not expressly asserted that the California portion of DPV2 is necessary to meet California RPS is puzzling.<sup>6</sup> SCE did explicitly state that its request will help California achieve its renewable goals and the RPS goals for the state of California.<sup>7</sup> SCE stated that if these goals increase (to 33%, for example), as most policymakers suggest, then the demand for renewables will necessitate a significant increase in supply. SCE stated that the construction of the California portion of DPV2 will help meet the current goals, and is a low-cost option to meet any broader renewable energy goals that may occur.<sup>8</sup> SCE also provided the Commission with a letter from CAISO that states that it anticipates that the California portion of DPV2 will be an important facility for California to meet the RPS.<sup>9</sup>

Additionally, SCE provided information that compared the costs of the California portion of DPV2 with other high-voltage transmission projects.<sup>10</sup> SCE showed that the transmission line

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<sup>5</sup> *Id.*

<sup>6</sup> PD, p. 15.

<sup>7</sup> (“Granting SCE’s request will allow California to access potential new renewable and conventional gas-fired generation in the Blythe area, which will help California achieve renewable goals and the RPS goals for the state of California.”) May 14, 2008, Petition for Modification.

<sup>8</sup> September 2, 2008, Amendment, p. 12.

<sup>9</sup> June 26, 2009, Supplemental Filing, Attachment I., Letter re: Conditions for ISO Agreement to Construction of California Portion of Devers-Palo Verde No. 2 Transmission Project (A.05-04-015) from CAISO to Judge Kolakowski of the CPUC, dated June 19, 2009. (“The [ISO] anticipates that the California portion of the [DPV2] 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 [DPV2] 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). (Emphasis added).

<sup>10</sup> September 12, 2008, Supplement to Southern California Edison Company’s Amendment to Petition for Modification, pp. 5-8.

costs of DPV2 are lower than the transmission line costs of other large high-voltage projects being considered (or that have been approved) in California. The PD does not mention the cost information presented in SCE's September 12, 2008, Supplement, and it may have simply been overlooked.

SCE requests that its statements be correctly characterized, and provides suggested clarifications to the discussion at p. 15 and to Conclusion of Law No. 4 in Attachment A.

SCE notes that the PD appears to use some clarifications that were recently proposed by the Division of Ratepayer Advocates in the Tehachapi Renewable Transmission Project ("TRTP") proceeding to the three-part test established in D.07-03-012. To the extent that the Commission desires to provide clarifying revisions to the three-part test for future project proponents, SCE suggests that such proposed revisions should be considered in a separate proceeding. This would allow all interested stakeholders an opportunity to focus on and respond to proposed revisions as applied prospectively to future projects. This application is not the appropriate forum for modifying D.07-03-012, because: (1) the comment schedule in this docket provides an inadequate period of time for the parties involved in this proceeding (including SCE) to thoroughly examine proposed changes and to explore and propose alternatives to those changes; and (2) there is inadequate notice to stakeholders (including but not limited to other California utilities, generators, and other interested parties). The Commission, if it wishes to pursue this issue, should address the test in a rulemaking that would enable the Commission to evaluate whether alterations to the test should be adopted for future proceedings.

### III.

#### **THE PROPOSED DECISION CONTAINS FACTUAL ERRORS THAT SHOULD BE CORRECTED**

##### **A. The Discussion of the Project Costs Erroneously Refers to the Costs for the Entire Project and not the Costs for the California Portion of the Project**

The PD makes two factual errors concerning the cost for the project that should be corrected to ensure that the record and the final decision are accurate.

First, the PD states that the “maximum reasonable and prudent cost (maximum cost)” set by the Commission for DPV2 was “\$545,285,000 in 2005 [*sic*] including pensions and benefits, and administrative and general overheads, but excluding Allowance for Funds Used During Construction (“AFUDC”).”<sup>11</sup> The PD should be modified to state that the maximum cost set by the Commission was \$545,285,000 in 2005 dollars.

Second, the PD states that SCE now estimates that the California portion of the project is \$686 million in 2009 dollars.<sup>12</sup> The escalated cost for the California portion is \$526 million in 2009 dollars (with an additional \$10 million expenditure if project is routed around Alligator Rock, referred to as Alligator Rock North of Desert Center).<sup>13</sup> The PD should be corrected to state that the California portion of the project is \$526 million in 2009 dollars (to be increased by \$10 million if the Alligator Rock-North of Desert Center route segment is used).<sup>14</sup>

The PD goes on to state that the California portion of DPV2 is over \$100 million more than the maximum cost set for the entire project including Arizona – with only 4 years of cost

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<sup>11</sup> PD, p. 23.

<sup>12</sup> PD, p. 24. The total cost for the Project, escalated from 2005 dollars to 2008 and 2009 dollars, is shown in SCE’s June 26, 2009, Supplemental Filing, Attachment K [DPV2’s 2005 Constant Dollar Estimate Escalated to 2008 and 2009 Constant Dollars]. The cost for the California portion is as shown in SCE’s June 26, 2009, Supplemental Filing, Attachment L [Summary of California Portion Only].

<sup>13</sup> SCE’s June 26, 2009, Supplemental Filing, Attachment L.

<sup>14</sup> It appears the PD referred to Attachment K, which was intended to show how SCE escalated the \$545 million (\$2005 dollars) cost estimate that was adopted by the Commission in D.07-01-040 from 2005 dollars to \$680 million in 2009 dollars. The \$680 million is the \$545 million cost of the entire project -- not the California portion -- escalated from 2005 dollars to 2009 dollars.

escalation. This sentence should be deleted as it is based on the incorrect assumption that the California portion would cost \$686 million in 2009 dollars instead of \$526 million in 2009 dollars.

Importantly, SCE explained that although it escalated the costs for the project to 2009 dollars, SCE does not consider the escalated costs that it presented in the June 2009 Supplement to be new cost-estimates.<sup>15</sup> As such, in D.07-01-040, the Commission granted SCE’s request that it be allowed to update the cost-estimate once when SCE has “...developed a final detailed engineering design-based construction estimate, particularly given the fact that certain routing options remained under consideration.”<sup>16</sup>

SCE appreciates that the PD grants SCE’s request to provide additional information in an advice filing. SCE recognizes that its cost-estimates were not prominently featured in its June 26, 2009, Supplemental Filing. SCE will attempt to provide a format in the Advice Letter that explains the information requested in the PD more clearly. SCE will file the advice letter within 30 days of the availability of a final detailed engineering design-based construction estimate, so that the Commission may reconsider the appropriate maximum cost for the California portion of the project.

For the reasons discussed above, SCE suggests that the discussion at p. 24 of the PD be revised and has suggested language in Attachment A, and as shown below:

~~“SCE now estimates that the California-only Project will cost \$686 million in 2009 dollars, with an additional \$10 million if the Alligator-Rock-North of Desert Center route is used. As an initial matter, it is troubling that SCE’s cost estimate for the California-only Project is over \$100 million more than the maximum cost set for the entire Project—including the Arizona portion—with only 4 years of cost escalation. SCE does not explain how it calculated~~

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<sup>15</sup> SCE stated that, “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.” The cost estimates that SCE provided are not new estimates, they are the uncontested estimates adopted by the Commission in 2005 as adopted by the original Commission Decision. SCE understood that TURN, and other parties desired that those costs be placed on the same basis as the cost estimates for the Midpoint Switchyard – which were in \$2008 dollars.

<sup>16</sup> PD, p. 24.

the escalation of 2005 dollars to 2009 dollars.” (Additions are shown in underline; deletions with strike-through.)

**B. The Proposed Decision Should Clarify that the Project will Parallel the Devers-Valley No. 1 500 kV Transmission Line as Well as the Devers-Palo Verde No. 1 Transmission Line**

The PD states in Finding of Fact No. 3 that the California portion of DPV2 would be constructed almost entirely within the existing high-voltage transmission rights-of-way occupied by the 500 kV Devers-Palo Verde No. 1 Transmission Line. To be clear, the California portion of DPV2 would also be constructed within the rights-of-way occupied by the 500 kV Devers-Valley No. 1 Transmission Line. As stated in the PD on p. 2, part of the Project includes a line known as “Devers-Valley No. 2.” The Devers-Valley No. 2 Transmission Line would parallel the Devers-Valley No. 1 Transmission Line. SCE suggests that Finding of Fact No. 3 be clarified as shown in Attachment A to eliminate this inaccuracy.

**IV.**

**OTHER REQUESTED REVISIONS**

The PD requires SCE to provide notice to the Director of the Commission’s Energy Division on the status of the interconnection queue and executed interconnection agreements as they relate to the California portion of DPV2 every six months.<sup>17</sup> SCE requests that the PD clarify that SCE need only provide the notices until such time as the CAISO requirements for CAISO Board approval have been met, or until the reports are no longer required by the Energy Division. SCE has provided suggested language in Attachment A.

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<sup>17</sup> PD, p. 23.

V.

**CONCLUSION**

For all of the reasons discussed above, SCE requests that the Proposed Decision be modified with the changes shown in Attachment A, to ensure that the record and the final decision are legally and factually accurate. With these changes, the Commission should now adopt the PD and issue a decision authorizing SCE to construct the California portion of DPV2.

Respectfully submitted,

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October 19, 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 **COMMENTS OF THE SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PROPOSED DECISION OF ALJ KOLAKOWSKI MODIFYING DECISION NO. 07-01-040 ON THE DEVERS-PALO VERDE NO. 2 TRANSMISSION LINE PROJECT** 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 **19th day of October, 2009**, at Rosemead, California.

/s/ Meraj F. Rizvi

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## APPENDIX A

*SCE's Recommended Revisions to the Proposed Decision of  
ALJ Kolakowski Modifying Decision No. 07-01-040  
on the Devers-Palo Verde No. 2 Transmission Line Project*

Additions are underlined  
Deletions in ~~striketrough~~

### Findings of Fact

3. The California-only Project would be constructed almost entirely within the existing high-voltage transmission rights-of-way occupied by the 500 kV Devers-Palo Verde No. 1 transmission line and the 500 kV Devers -Valley No. 1 transmission line.
5. SCE filed a Petition for Modification of D.07-01-040 on May 14, 2008. SCE filed an Amendment to the Petition on September 2, 2008, and a Supplement to the Amendment on September 12, 2008, in accordance with a joint Commissioner-ALJ Ruling issued on July 17, 2008. Due to a number of changed circumstances, SCE made a supplemental filing on June 26, 2009.
8. There is no guarantee that the Arizona portion of the Project will ever be completed, and SCE's letter to the ACC dated May 15, 2009 indicates that SCE does not intend to file a new application for approval of the Arizona portion of the Project ~~in the near future~~ at this time, but may do so in the future based on further interconnection studies.

### Conclusions of Law

4. SCE has not demonstrated that the California-only Project meets the requirements set forth in California Pub. Util. Code § 399.2.5 (b)(4) for cost recovery. SCE may later seek recovery of costs that are not approved for recovery in transmission rates by the FERC.

### Other

Page 5:

The first attachment was a copy of a letter to the Commissioners, dated May 15, 2009, referring them to the letter to the ACC and informing them that SCE intended to discontinue pursuit of ACC approval for the Arizona portion of the Project and stating SCE's intention to pursue the California portion of the Project. The second attachment was a copy of a letter to the ACC dated May 15, 2009, stating that SCE had updated its economic analysis and that the benefits of the Project are "significantly lower as a result of recent developments." The letter stated that SCE would not be refiling with the ACC for authorization of the Arizona portion of the Project at this time, although SCE may do so in the future based on further interconnection studies.

Page 10:

On this basis, SCE informed the ACC in its May 15, 2009, letter to the ACC that it would no longer pursue authorization to construct the Arizona portion of the project at this time, although SCE may do so in the future based on further interconnection studies.

Page 15:

However, and significantly, SCE has not expressly asserted that ~~the California-only Project is necessary to meet California's RPS and SCE has not requested approval of the California-only Project pursuant to Section 399.2.5-~~ it is requesting that the Commission authorize cost recovery in retail rates under Pub. Util. Code Section 399.2.5(b)(4). SCE is not waiving its statutory right to seek such recovery in the future. Rather, SCE has claimed that the California-only Project is needed to interconnect both renewable and conventional generation resources proposed to be located in the Blythe area. Nevertheless, because of the extensive renewable potential of the Blythe area, and the RETI 2A Draft Report's identification of the California-only Project as needed to deliver those resources to Southern California load centers, we will consider the § 399.2.5 need analysis applied in previous renewable transmission CPCN cases to determine the need for the California-only Project.

Page 23:

Consequently, we require SCE to provide notice to the Director of the Commission's Energy Division on the status of the interconnection queue and interconnection agreements as they relate to the California-only Project every six months until such time as the CAISO requirements for CAISO Board approval have been met, or until the reports are no longer required by the Energy Division. Such notices shall include information on both renewable interconnection requests and agreements, as well as information on conventional generation seeking interconnection to the California-only Project.

The Decision established a maximum reasonable and prudent cost (maximum cost) for the Project pursuant to Pub. Util. Code § 1005.5(a) of \$545,285,000 in 2005 dollars including pension and benefits, and administrative and general overheads, but excluding Allowance for Funds Used During Construction (AFUDC).

Page 24:

SCE now estimates that the California-only Project will cost ~~\$686~~ \$526 million in 2009 dollars, with an additional \$10 million if the Alligator-Rock-North of Desert Center routes is used. ~~As an initial matter, it is troubling that SCE's cost estimate for the California-only Project is over \$100 million more than the maximum cost set for the entire Project—including the Arizona portion—with only 4 years of cost escalation. SCE does not explain how it calculated the escalation of 2005 dollars to 2009 dollars.~~



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