

**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 Regarding the Eldorado-Lugo-Mohave Series Capacitor Project.

Application No. 18-05-007

**REPLY TO THE PUBLIC ADVOCATES OFFICE'S PROTEST  
TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION**

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Dated: **May 30, 2019**

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**I.**

**INTRODUCTION**

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) responds to the Protest of the Public Advocates Office (Public Advocates Office) to SCE's application for a Certificate of Public Convenience and Necessity (CPCN) to construct the Eldorado Lugo Mohave Series Capacitor Project (ELM, or ELM Project).

**II.**

**BACKGROUND**

On May 2, 2018, SCE filed an Application for a Permit to Construct (PTC) the ELM Project (PTC Application), which requested the authorization to construct two new 500 kilovolt (kV) series capacitors; the installation of approximately 235 miles of optical ground wire (OPGW); the relocation, replacement or modification of existing transmission, subtransmission,

and distribution facilities; and the installation of overhead and underground telecommunication facilities from existing structures to the new series capacitors.<sup>1</sup>

On June 1, 2018, the Public Advocates Office protested the PTC Application claiming that SCE should have instead filed an application for a CPCN. On January 9, 2019, Commissioner Picker issued a ruling ordering SCE to amend its application and instead seek a CPCN for the ELM Project.

On April 19, 2019, SCE filed its Amended Application for a CPCN regarding the ELM Project (CPCN Application). Pursuant to General Order 131-D (GO 131-D), the CPCN Application included additional information on the cost and the need for the ELM Project and described certain changes or clarifications to the project objectives included in the 2018 PTC Application. Specifically, the CPCN Application describes the change in the Renewable Portfolio Standard (RPS) from 33% by 2020 to 60% by 2030, and how that change impacts the ELM Project objectives and need; clarifies the fact that the Electrical Needs Area (ENA) includes more than just the Los Angeles Basin; clarifies that power delivery will not just be from Ivanpah Valley, but also from other areas in California, Nevada and Arizona; and revises the project objective related to reducing power flow into the Los Angeles Department of Water and Power (LADWP) to note that the ELM Project is only needed to reduce power flow into the LADWP system during abnormal conditions.

On May 20, 2019, the Public Advocates Office protested the CPCN application, claiming that the cost and need for the ELM Project are not justified. The Public Advocates Office also requests that the schedule for this proceeding be significantly lengthened from that proposed by SCE. As discussed below, the Public Advocates Office's protest should be dismissed as SCE's CPCN Application contains ample justification to support the cost and need for the ELM Project. Any modifications or revisions to SCE's project objectives were intended merely to update the

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<sup>1</sup> A complete description of the ELM Project can be found in SCE's Proponent Environmental Assessment (PEA) as well as in SCE's CPCN Application.

CPUC of any changes that have occurred, or clarifications required, since SCE filed its PTC Application in 2018. Finally, the Public Advocates Office's claim that the proposed schedule should be significantly lengthened in order to provide extensive time for discovery and testimony should be rejected.

### III.

#### **DISCUSSION**

A. **The CPCN Application Sufficiently Justifies The Need For The Project And Any Revisions Are Simply Intended to Update Or Clarify What Was Submitted Previously.**

As evidence in support of its argument that the need for the ELM Project is not justified, the Public Advocates Office claims that SCE made several changes in its CPCN Application, including revising the Electrical Needs Area (ENA), and expanding the scope of power delivery from various locations within California. These claims, however, fail to consider the fact the PTC Application was filed over a year ago in May of 2018. In addition, unlike a PTC Application, a CPCN Application must include evidence of the cost and the need for the project (G.O. 131-D, IX.A.1). Accordingly, it is reasonable to assume that there may be updates and additions that need to be included in the CPCN Application in order to provide the CPUC with a current understanding of the project. These additions and clarifications do not distract from the need for the Project.

Moreover, the additions and clarifications are relatively minor and are intended merely to update what SCE filed previously. For example, the language describing the ENA was revised to better define the area that will be benefited by the ELM Project. As shown in Figure 1-2 of SCE's PEA, it is not just the Los Angeles Basin that is benefited by the ELM Project, but the

entire CAISO-controlled grid.<sup>2</sup> Accordingly, the language was revised to indicate that the ELM Project will also benefit areas outside of SCE's service territory (for example, areas within San Diego Gas & Electric (SDG&E), Gridliance West (GLW) and Valley Electric Association (VEA) territory). Because the ELM Project will provide an increased amount of renewable energy to the entire CAISO-controlled grid, that energy can then be used by those service territories to meet their RPS requirements.

The CPCN Application also clarifies that the ELM Project would allow for renewable energy to be imported from areas within the CAISO-controlled grid that extend beyond the Ivanpah Valley. While the PTC Application focused primarily on Ivanpah Valley, the ELM Project would actually benefit a number of locations throughout California due to the increased amount of power capable of being delivered. Accordingly, the CPCN Application revised this language to clarify that some of the projects that would benefit from the ELM Project are located in Competitive Renewable Energy Zones (CREZs) outside of Ivanpah Valley.

The Public Advocates Office also states that the CAISO Queue Lists SCE has submitted to date are inconsistent. As is described in the CPCN Application, the ELM Project is needed for the generation projects identified in SCE's Proponent Environmental Assessment (PEA) to achieve FCDS as outlined in their respective IAs and/or Upgrade Facilities Agreements.<sup>3</sup> As would be expected, those lists change over time, particularly as generators fall in and out of the interconnection queue. More specifically, generators may fall out of the queue because they decide not to move forward with their projects, or they fail to procure an IA. Table 2-1 of the

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<sup>2</sup> See PEA Figure 1-2 at: [http://www.cpuc.ca.gov/environment/info/aspen/elm/pea/voll\\_ch1-ch3.pdf](http://www.cpuc.ca.gov/environment/info/aspen/elm/pea/voll_ch1-ch3.pdf) (depicting a map of the entire CAISO-controlled grid as the ENA.)

<sup>3</sup> CPCN Application at P. 6.

PEA identified the list of projects, that at the time, had signed IAs or Upgrade Facilities Agreements, as well as projects that were in the interconnection queue but had yet to sign an IA<sup>4</sup>. As noted in its Protest, on June 27, 2018, SCE provided an update of the PEA queue list to the Public Advocates office via a data request response. That data request response is attached hereto as Exhibit “A”. The data request response indicated that three projects (specifically, the projects in CAISO queue positions Q1401, Q1404 and Q1417) had since been withdrawn from the queue. In addition, there was a minor clarification correcting the queue position of one of the projects, and two of the projects previously described in the PEA were excluded because they do not connect to the bulk transmission system and therefore are not within the CAISO interconnection queue.<sup>5</sup>

SCE provided a further update to the Public Advocates Office in a meeting held on April 29, 2019.<sup>6</sup> At that meeting, SCE reviewed the current list of projects with signed IAs in the CAISO interconnection queue that require the ELM Project in order to achieve FCDS. The list presented at the April 29<sup>th</sup> meeting is attached hereto as Exhibit “B”. As indicated, there was an

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<sup>4</sup> PEA at Table 2-1.

<sup>5</sup> Specifically, Table 2-1 of the PEA referred to “Queue 1335” when it should have been “Queue 1336” and this was updated in the revised list. The revised list also did not include two projects that had previously been included in Table 2-1 (WDAT 1381 and WDAT 1490), since the revised table was intended to focus only on projects within the CAISO interconnection queue and not those requesting to interconnect under the Wholesale Distribution Access Tariff (WDAT).

<sup>6</sup> In its Protest, the Public Advocates Office refers to a CAISO Queue List that SCE submitted with its CPCN application. However, SCE did not submit a list with its CPCN Application, and the footnote reference cites instead the power point presentation SCE provided to the Public Advocates Office on April 29, 2019.

increase in generation capacity of approximately 1,591 MW (for a total of 2,377 MW<sup>7</sup>) beyond that which was assumed in 2018<sup>8</sup>.

While the Public Advocates Office is correct that the queue lists have changed over time, this is not evidence that the CPCN Application fails to adequately justify the need for the ELM Project. Rather, those lists will continue to be updated and refined as the proceeding continues.

**B. The CPCN Application Fully Justifies The Costs For The ELM Project**

The Public Advocates Office also alleges that the CPCN Application does not sufficiently justify the costs for the ELM Project because the project costs have varied over time from the CAISO's 2012 and 2013 Transmission Planning Processes (TPP), SCE's 2018 GRC workpapers, the 2018 PTC application and the CPCN application. SCE developed the original CAISO 2012-2013 and 2013-2014 TPP costs based on a high-level engineering study utilizing SCE's Unit Costs. The 2012-2013 TPP scope consisted of upgrades of two series capacitors: one at Lugo Substation, and one at Eldorado Substation with associated terminal upgrades.<sup>9</sup> The 2013-2014 TPP Scope consisted of upgrades of two series capacitors, one at Lugo Substation and one at Mohave Substation<sup>10</sup>. The estimated cost of these series capacitor upgrades that formed the ELM project was \$191M (\$121 million from the 2012-2013 TPP and \$70 million from the 2013-2104 TPP).

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<sup>7</sup> Upon review, it was determined that the list provided to the Public Advocates Office was not tabulated properly. The column total depicting the project size in execution shows "1,394MW", however, when tabulating the rows, the figure is actually 2,285 MW. Including the installed capacity of 92 MW, which represents generation currently in-service, this total is identified as 2,377 MW.

<sup>8</sup> Not included in the April 29, 2019 update were two projects (WDAT 1381 and WD1490) that have IAs, but were omitted from the list because they are not connecting to the CAISO bulk transmission system. The combined output of these two projects is approximately 105 MW. Each of these projects requires completion of the ELM Project to achieve FCDS. Including these two projects increases the capacity to approximately 2,482 MW.

<sup>9</sup> 2012-2013 CAISO Transmission Plan, Table 7.2-2.

<sup>10</sup> 2013-2014 CAISO Transmission Plan, Table 7.2-2.

Between 2014 (CAISO TPP) and 2016 (proposed project for 2018 General Rate Case workpapers), SCE revised the scope to include the two mid-line capacitor banks at the Newberry Springs and Ludlow substations, along with the associated equipment and telecom work required for the mid-line capacitors. This added scope and escalation (adjusted for inflation) resulted in the estimate of \$269M Nominal dollars.

When SCE filed the PTC application in 2018, it received engineer, procure, and construct (EPC) contractor bids for portions of the work resulting in savings through industry best practice design and a reduction in contingency for the overall project due to increased cost certainty for work with bids received. The refined cost at this time was reduced to \$225M in 2018 Constant dollars.

When SCE filed its CPCN Application in 2019, the costs were adjusted upwards to reflect escalation, increased licensing costs, and additional EPC vendor and SCE costs due to project delays. Additionally, SCE revised the scope to include the new circuit breakers now required at LADWP's McCullough Substation and the additional environmental restoration costs. This resulted in an increase to \$250M in 2019 Constant dollars.

**C. The Schedule Proposed By Public Advocates Office Is In Excess Of That Required.**

The schedule set forth in the CPCN Application was designed to ensure that SCE completes the ELM Project as soon as practical in order to meet the generators' need for FCDS and was based on an anticipated construction duration of approximately 15 months. Adopting SCE's proposed Q1 2020 start of construction would allow SCE to achieve a June 2021 operating date.

The June 2021 operating date is necessary to meet the requirements of executed IAs with generators for FCDS which currently constitutes approximately 2,377<sup>11</sup> MW. This is an increase

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<sup>11</sup> If the two WDAT projects discussed in footnote 8 are included within this total, this amount would increase to 2,482 MW which would represent an increase of 1,696 MW.



of approximately 1,591 MW in needed FCDS compared to when SCE filed its PTC Application in May 2018.

The schedule proposed by Public Advocates Office would delay a final decision by at least six months. This delay is made even more significant considering that during the peak summer season, SCE cannot start construction on the 500kV transmission lines. Construction on the 500 kV transmission lines would be delayed until October 2020 due to the 500kV transmission line outage constraints that typically occur during the months of June thru September, further delaying the project operating date to January 2022.

The Public Advocates Office argues that this prolonged schedule is necessary in order to provide ample time for discovery, analysis, testimony and evidentiary hearings. SCE respectfully disagrees that such a protracted schedule is necessary, particularly given that the information Public Advocates Office objects to in the CPCN Application is largely clarifying the information that has been available to Public Advocates Office since SCE filed its PTC Application over a year ago. By proposing sequential, rather than concurrent testimony, the Public Advocates Office effectively delays the proceeding by at least six months. Rather, SCE requests that testimony be prepared concurrently, which is consistent with the way the CPUC has handled proceedings in the past.<sup>12</sup>

#### IV.

#### **CONCLUSION**

For the reasons stated above, SCE's CPCN Application provides sufficient information to justify the need and the cost for the ELM Project and the Public Advocates Office's Protest should be rejected in its entirety.

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<sup>12</sup> For example, *see* SCE's West of Devers proceeding (A.13-10-020) where both concurrent direct and rebuttal testimony were allowed; SCE's Tehachapi Renewable Transmission Project (A.07.06.031), concurrent direct and rebuttal allowed; and SCE's Alberhill proceeding (A.09.09.022), sequential direct but concurrent rebuttal allowed.

Respectfully submitted,

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*/s/ Tammy Jones*

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By: Tammy Jones

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May 30, 2019

## Appendix A

*Southern California Edison*  
**ELM Project A.18-05-007**

**DATA REQUEST SET A1805007 ORA-SCE-ELM-001**

**To:** ORA

**Prepared by:** Selya Arce

**Title:** Senior Project Manager

**Dated:** 06/13/2018

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**Question 01:**

Please identify the generators that are interconnecting with the Proposed Project, including their rated output, the location of their interconnection (please include a map), and the generators whose Interconnection Agreements require Full Capacity Deliverability Status.

**Response to Question 01:**

Generation projects seeking interconnection with the Proposed Project are identified in study reports that are produced following the CAISO Generation Interconnection Procedures. These reports specifically define the generation projects, by queue number, which require the Proposed Project to obtain Full Capacity Deliverability Status. Table 1 itemizes the specific generation projects seeking interconnection to transmission owned by SCE or which impact the joint-owned Eldorado 230 kV Substation [e.g., Valley Electric Association (VEA) /GridLiance interconnection requests]. It is important to note that other generation projects seeking interconnection to SDG&E are also dependent on the Proposed Project. The CAISO should be consulted for a complete list of these other generation projects. Table 2 itemizes the two CAISO Transmission Plans that support the need for the Proposed Project to address the CPUC's RPS Portfolio needs. While the two plans referenced identify each of the two lines (Eldorado-Lugo and Lugo-Mohave) separately, SCE has combined them into one project for development and construction.

The detailed geographic location of the generators identified in Table 1 is provided in the corresponding confidential Phase I or Phase II Appendix A Reports<sup>1</sup>. Specific Competitive Renewable Energy Zone (CREZ) locations can be determined by referencing the CREZ Boundaries shown in Figure 1-11. The boundaries of CREZs represent the geographic areas within which renewable resources and development potential is expected and align with the CPUC's identified RPS Portfolio as provided to the CAISO and shown in the CAISO 2012-2013 and 2013-2014 Transmission Plans outlined in Table 2. Figure 1-2 illustrates the Point of Interconnection for the generators identified in Table 1 relative to the CREZ boundaries.

Figures 1-1 and 1-2 are contained in the attached file "ORA\_DR\_Question\_1-Figures.pdf"  
Tables 1 and 2 are contained in the attached file "ORA\_DR\_Question\_1-Figures.pdf"

**1. The confidential Phase I or Phase II Appendix A Reports identified in Table 1 will be submitted to the CPUC in a Supplemental Response due to the additional time needed to ensure**

compliance with the CPUC confidentiality rules.

**Table 1 – Generation Projects and associated reports identifying the Proposed Project<sup>1</sup> as a requirement to achieve FCDS**

CAISO Queue	Study	Report Name	Requested MW	Page No.	Estimated GIA Date <sup>2</sup>	CREZ
643AE 855	QC3 QC4	QC3&4 Phase II Interconnection Study Report- SCE Eastern Area	N/A	61-62	N/A	Not Applicable
		QC3&4 Phase II Interconnection Study Report- SCE/VEA EOP Area	N/A	29-33	N/A	Not Applicable
		Q643AE Addendum to Phase II Appendix A Report	150	2	Complete	Riverside East
		Q855 Phase II Appendix A Report	92	8	Complete	Mtn Pass & El Dorado
993 994	QC6	QC6 Phase II Interconnection Study Report- SCE/VEA EOP Area	N/A	33-36	N/A	Not Applicable
		Q993 QC6 Phase II Appendix A Report	50	11-12	Complete	Mtn Pass & El Dorado
		Q994 QC6 Phase II Appendix A Report	50	11-12	Complete	
		QC7 Phase II Interconnection Study Report- SCE/VEA EOP	N/A	40-43	N/A	Not Applicable
1064	QC7	Q1064 QC7 Phase II Appendix A Report	44	16-17	UFA Complete	Mtn Pass & El Dorado
1192 1196 1198 1200 1218	QC8	QC8 Phase II Interconnection Study Report – SCE Eastern Area	N/A	31-40	N/A	Not Applicable
		QC8 Phase II Interconnection Study Report – SCE/VEA EOP Area	N/A	42-47	N/A	Not Applicable
		Q1192 QC8 Phase II Appendix A Report	350	16	Q1, 2019	Riverside East
		Q1196 QC8 Phase II Appendix A Report	400	16	Complete	
		Q1198 QC8 Phase II Appendix A Report	150	15	Q1, 2019	
		Q1200 QC8 Phase II Appendix A Report	200	16	Q1, 2019	
		Q1218 QC8 Phase II Appendix A Report	400	16	Parked	
		QC9 Phase II Interconnection Study Report – SCE Eastern Area	N/A	40-43	N/A	
QC9 Phase II Interconnection Study Report-SCE/VEA EOP Area	N/A	40-43	N/A	Not Applicable		
Q1302 QC9 Phase II Appendix A Report	213.5	23-24	Parked	Riverside East		
1302 1336 1339 1341 1347	QC9	Q1336 QC9 Phase II Appendix A Report	375	22-23	Parked	Mtn Pass & El Dorado
		Q1339 QC9 Phase II Appendix A Report	300	20	Q1, 2019	
		Q1341 QC9 Phase II Appendix A Report	250	18-19	Parked	
		Q1347 QC9 Phase II Appendix A Report	303	18-19	Parked	

<sup>1</sup> The Proposed Project refers to the Eldorado-Lugo and Lugo-Mohave series capacitor project.

<sup>2</sup> Development of GIA's for Parked projects are expected to commence following completion of QC10 TPD Process expected in Q2, 2019. Depending on TPD results, earliest expected timeframe for GIA is Q4, 2019.

CAISO Queue	Study	Report Name	MW	Page No.	Estimated GIA Date <sup>3</sup>	CREZ
1400	QC10	QC10 Phase I Interconnection Study Report - SCE Eastern Area	N/A	45-50	QC10 Projects currently undergoing Phase II Studies. GIA will follow completion of TPD process performed as part of QC10.	Not Applicable
1402		QC10 Phase I Interconnection Study Report - SCE/VEA EOP Area	N/A	41-46		Not Applicable
1403		Q1400 QC10 Phase I Appendix A Report	266.5	13-14		Mtn Pass & El Dorado
1405		Q1402 QC10 Phase I Appendix A Report	3,200	20-21		
1406		Q1403 QC10 Phase I Appendix A Report	450	20-21		
		Q1405 QC10 Phase I Appendix A Report	450	23-24		
		Q1406 QC10 Phase I Appendix A Report	675	22-23		Riverside East

**Table 2 – CAISO Transmission Plans recommending the Proposed Project for Approval**

File Name	link	Reference Pages <sup>4</sup>	Comment
CAISO 2012-2013 Transmission Plan <sup>5</sup>	<a href="https://www.aiso.com/Documents/BoardApproved2012-2013TransmissionPlan.pdf">https://www.aiso.com/Documents/BoardApproved2012-2013TransmissionPlan.pdf</a>	Pgs. 273-280	Eldorado-Lugo series capacitor project recommended for approval a policy driven project
CAISO 2013-2014 Transmission Plan <sup>6</sup>	<a href="https://www.aiso.com/Documents/Board-Approved2013-2014TransmissionPlan_July162014.pdf">https://www.aiso.com/Documents/Board-Approved2013-2014TransmissionPlan_July162014.pdf</a>	Pgs. 291-196	Lugo-Mohave series capacitor project recommended for approval a policy driven project

<sup>3</sup> Development of GIA's for QC10 generation projects are expected to commence following completion of QC10 TPD Process expected in Q2, 2019. Depending on TPD results, earliest expected timeframe for GIA is Q4, 2019.

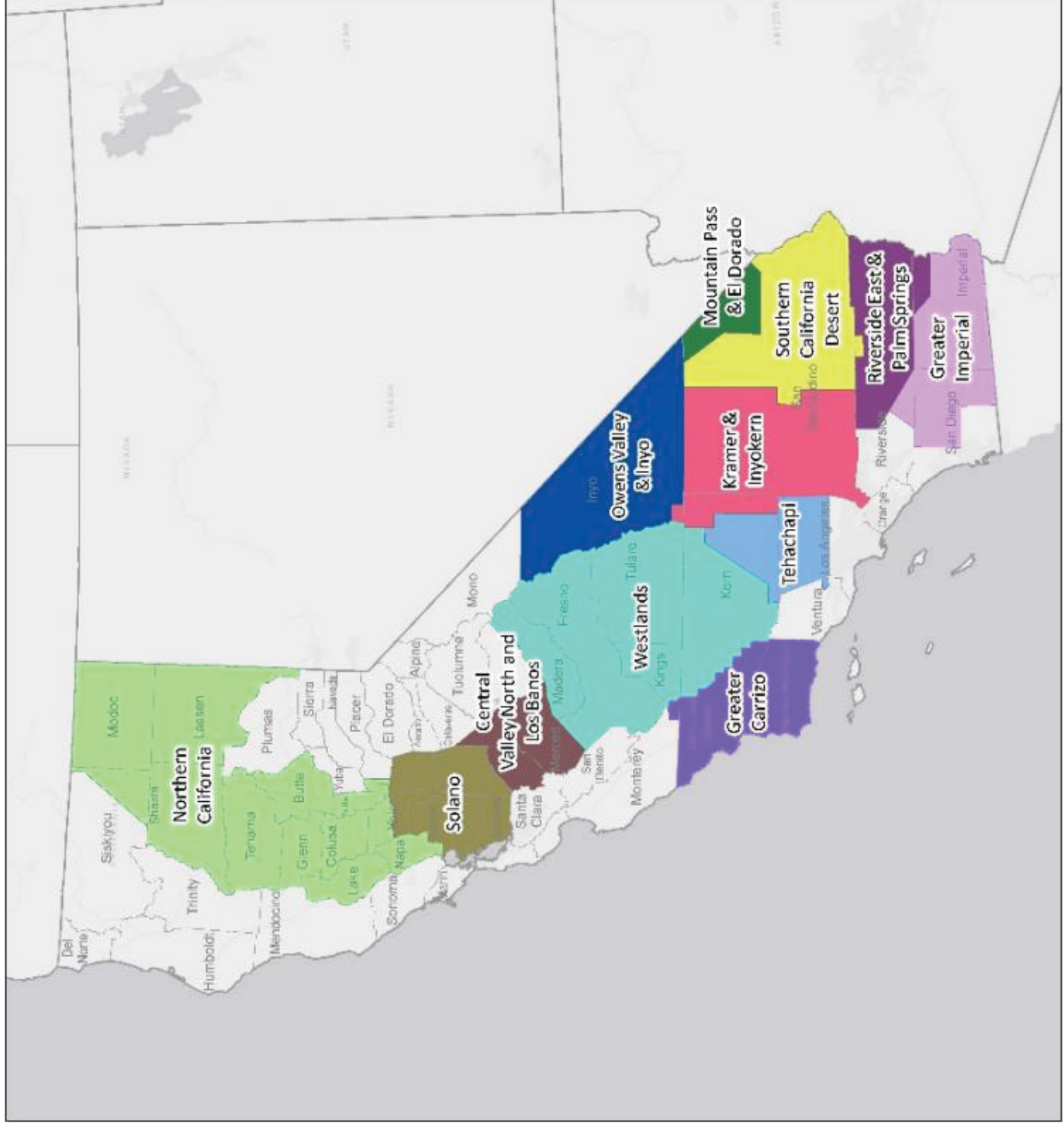
<sup>4</sup> The provided reference pages discuss the SCE Area Policy-Driven conclusions. Information related to the Policy Driven study assumptions and methodology related to the RPS generation portfolio can be found within body of each of the referenced transmission plans.

<sup>5</sup> The CPUC and California Energy Commission sent a letter on March 12, 2012 formally recommending the renewable portfolios for use in the CAISO 2012-2013 transmission planning process. Link to document: <http://www.aiso.com/Documents/PortfolioSubmittalLetter.pdf>. The March 12 letter was subsequently revised in a letter dated March 23, 2012. Link to document: [http://www.aiso.com/Documents/2012-2013-FinalRenewableGenerationPortfoliosRecommended\\_CPUC-CEC.pdf](http://www.aiso.com/Documents/2012-2013-FinalRenewableGenerationPortfoliosRecommended_CPUC-CEC.pdf).

<sup>6</sup> The CPUC and California Energy Commission sent a letter on February 7, 2013 formally recommending the renewable portfolios for use in the CAISO 2012-2013 transmission planning process. Link to document: <http://www.aiso.com/Documents/2013-2014RenewablePortfoliosTransmittalLetter.pdf>.

**Figure 1-1**

**Competitive Renewable Energy Zone (CREZ) Boundaries**





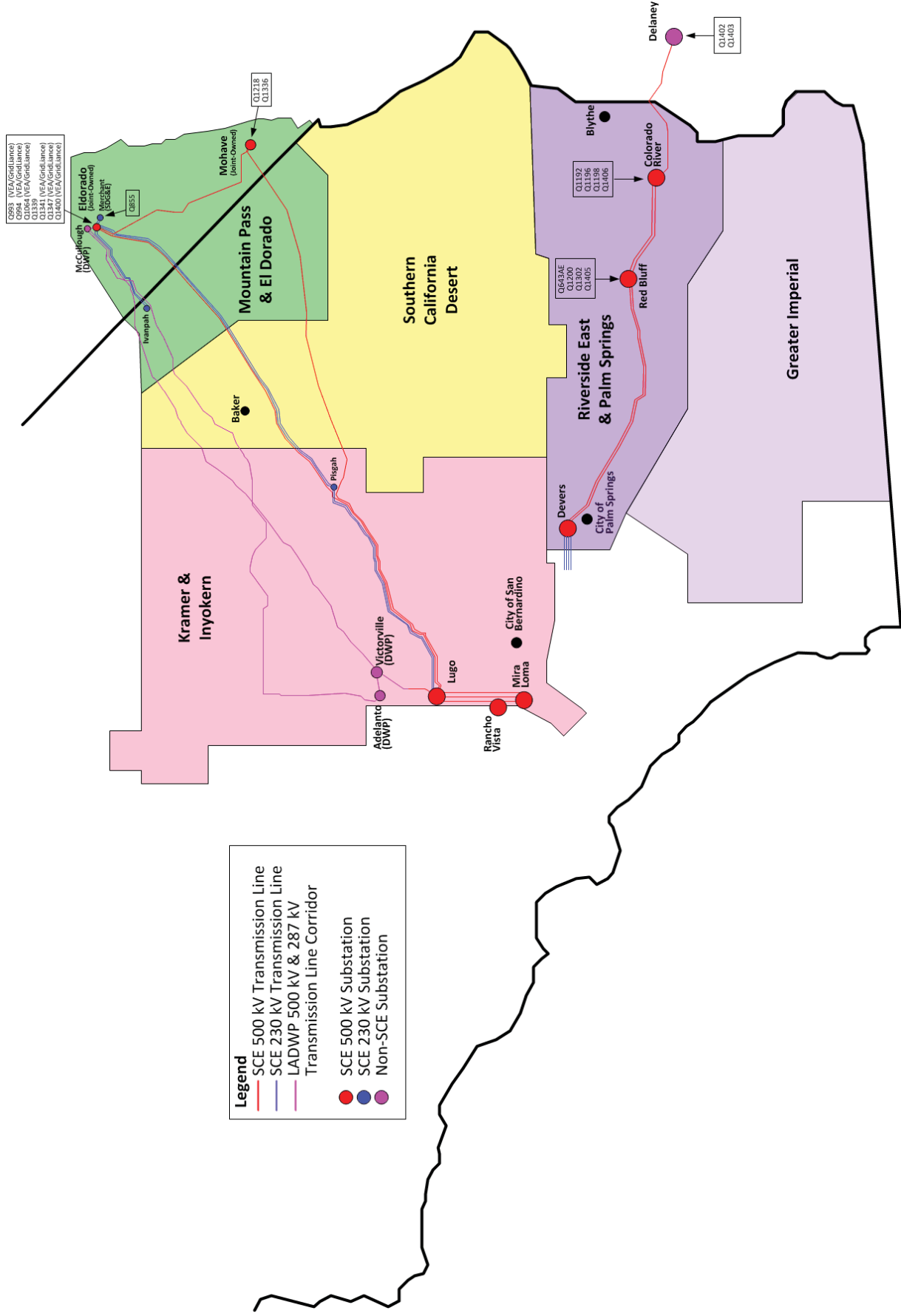


Figure 1-2 Point of Interconnection for Generator's Requiring Project for FCDS relative to CREZ boundaries

## **Appendix B**



# Eldorado-Lugo-Mohave 500kV Series Capacitor Project

**Project Overview for Public Advocates Office  
April 29, 2019**

Appendix B-1

# Projects Impacted

Generation Interconnection Projects that Require the ELM Project to achieve FCDS					
CAISO Queue Position	CAISO Study	Technology	Project Size (MW)		Project Status
			Installed	Execution	
643AE	QC3	Photovoltaic		150	IA – Executed In Service Date: 9/1/2021
855	QC4	Photovoltaic	92		UFA – Executed Commenced Commercial Operation: 12/2/2016
993/994	QC6	Photovoltaic		100	IA-Executed (VEA) UFA Pending In Service Date: 1/1/2020
1064	QC7	Energy Storage		44	IA-Executed (GWT) UFA – Executed 3/10/18 In Service Date: 7/30/2019
1192	QC6	Hybrid (PV/ES)		350	IA-Executed In Service Date: 4/1/2021
1196	QC8	Photovoltaic		400	IA-Executed In Service Date: 12/1/2020
1198	QC8	Photovoltaic		150	IA-Executed In Service Date: 1/15/2022
1200	QC8	Photovoltaic		200	IA-Executed In Service Date: 10/1/2021
1341	QC9 <sup>1</sup>	Photovoltaic		212.25	UFA – Executed
1347	QC9 <sup>2</sup>	Wind		228.77	UFA – Executed
1405	QC10	Hybrid (PV/ES)		450	IA – Executed
		<b>Totals</b>	<b>92</b>	<b>1394</b>	

<sup>[1]</sup> 84.9% of Net POI capacity eligible for FCDS as of 2018 TPD Allocation Study (250MW)  
<sup>[2]</sup> 75.5% of Net POI capacity eligible for FCDS as of 2018 TPD Allocation Study (303MW)

Appendix B-2

**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 Regarding the Eldorado-Lugo-Mohave Series Capacitor Project.

Application No. 18-05-007

**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 the **REPLY TO PUBLIC ADVOCATES OFFICE'S PROTEST TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION**, on all parties identified on the attached service list(s) for **A.18-05-007**. 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.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered via USPS First Class Mail to the offices of the Commissioner(s) or other addressee(s).

ALJ Jason Jungreis  
CPUC – Division of ALJs  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Executed this **May 30, 2019**, at Rosemead, California.

/s/ Kelly Morikawa Kwong  
Kelly Morikawa Kwong  
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California  
Public Utilities  
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## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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**LAST CHANGED: MAY 23, 2019**

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