

**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 Permit to Construct Electrical Facilities:  
Eldorado-Lugo-Mohave Series Capacitor Project.

Application No. 18-05-007  
(Filed May 2, 2018)

**MOTION FOR LEAVE TO FILE REPLY OF SOUTHERN CALIFORNIA EDISON  
COMPANY (U-338-E) TO THE OFFICE OF RATEPAYER ADVOCATES' RESPONSE  
TO SOUTHERN CALIFORNIA EDISON'S REPLY TO THE OFFICE OF RATEPAYER  
ADVOCATES' PROTEST**

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Dated: **July 10, 2018**

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**I.**

**INTRODUCTION**

Pursuant to Rule 11.1 of the California Public Utilities Commission's (CPUC) Rules of Practice and Procedure, Southern California Edison (SCE) files this motion in the above-captioned proceeding, seeking permission to reply to the Office of Ratepayer Advocates' (ORA) response to SCE's reply to ORA's protest. Rule 11.1 (b) of the Commission's Rules of Practice and Procedure allows for a motion to be made "at any time during the pendency of a proceeding by any party to the proceeding" and as discussed below, good cause exists to grant SCE's motion and allow it to file a response.<sup>1</sup>

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<sup>1</sup> SCE's Reply is filed concurrently under separate cover pursuant to instruction from the CPUC docket office.

## II.

### DISCUSSION

In its response to SCE's reply, ORA asserts that SCE made a number of statements that are factually suspect and/or incorrect. SCE seeks to clarify these statements, which will enable the CPUC to ensure it has a correct record moving forward in this proceeding. For example:

- SCE's reference to "vertical" relocation was not intended to claim a separate exemption under General Order (GO) 131-D, but instead was used as an illustration to demonstrate how raising the towers in this case does not trigger a CPCN because it is not "major" transmission line work under the *Red Bluff*<sup>2</sup> decision;
- The term "functional equivalent" was intended solely to demonstrate that series capacitors share the same components and physical likeness to that of substations and have far more in common with substation facilities than they do with major transmission line facilities; and
- The construction of the series capacitors is the primary work associated with the Eldorado Lugo Mohave Project (ELM Project), and all other work, such as the replacement of overhead ground wire with fiber optic ground wire, is ancillary to that work and is either not considered "major" transmission line work under the *Red Bluff*<sup>3</sup> decision and/or is exempt from a Certificate of Public Convenience and Necessity (CPCN).

## III.

### CONCLUSION

Good cause being demonstrated, SCE respectfully requests that its motion be granted and that SCE be allowed to file a reply to ORA's response.

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<sup>2</sup> *A.10-11-012 (In the Matter of the Application of Southern California Edison Company (U338E) for a Permit to Construct Electrical Facilities: Red Bluff Substation Project).*

<sup>3</sup> *Id.*

Respectfully submitted,

TAMMY JONES

*/s/ Tammy Jones*

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By: Tammy Jones

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**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 **MOTION FOR LEAVE TO FILE REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE OFFICE OF RATEPAYER ADVOCATES' RESPONSE TO SOUTHERN CALIFORNIA EDISON'S REPLY TO THE OFFICE OF RATEPAYER ADVOCATES' PROTEST**, on all parties identified on the attached service list(s) for **A.18-05-007**.

- 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 by U.S. Mail to the offices of the Commissioner(s) or other addressee(s).

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

Executed this **July 10, 2018**, at Rosemead, California.

*/s/ Angelica Gamboa*

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Angelica Gamboa

Legal Administrative Assistant

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Public Utilities  
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**FILER: SOUTHERN CALIFORNIA EDISON COMPANY**  
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**LAST CHANGED: JULY 3, 2018**

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