

Comment Set B1 – Southern California Gas Company



Anthony A. Klecha
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Southern California Gas Company
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August 27, 2015

Sent via Email

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: Draft Environmental Impact Report/Environmental Impact Statement for the Southern California Edison West of Devers Upgrade Project

B1-1

To Whom It May Concern:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the subject Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). SoCalGas understands that the proposed project would replace or upgrade Southern California Edison's (SCE's) existing 220 kV transmission lines and structures between Devers, El Casco, San Bernardino, and Vista substations to increase the system transfer capacity from 1,600 megawatts to 4,800 megawatts. Other components of the project would include substation equipment upgrades, relocation of 2 miles of 66 kV subtransmission lines and 4 miles of 12 kV distribution lines, and installation of telecommunications lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment. SoCalGas further understands that the proposed project would parallel, cross, or be adjacent to several SoCalGas pipelines. SoCalGas respectfully requests that the following comments be considered prior to certification of the Final EIR/EIS:

SoCalGas understands that SCE will contact Underground Service Alert (USA) at least two business days prior to performing any excavation work. SoCalGas further understands that SCE will perform engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected, and will share this information with SoCalGas, along with any applicable construction plans and protection measures or compensation to be implemented. SoCalGas concurs with these measures. Please contact Rosalyn Squires, Pipeline Planning Assistant, at (818) 701-4546 to coordinate the transfer of this information.

Once again, we appreciate the opportunity to comment on the proposed project. If you have any questions, please feel free to contact me at (213) 244-4339 or aklecha@semprautilities.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony A. Klecha", followed by a horizontal line.

Anthony A. Klecha
Southern California Gas Company

cc: Rosalyn Squires (SoCalGas)

Responses to Comment Set B1 – Southern California Gas Company

B1-1 The commenter states that it understands that the Proposed Project would parallel, cross, or be adjacent to several SoCalGas pipelines, and that SoCalGas concurs with the impact analysis and mitigation measures discussed in the Draft EIR/EIS to ensure the protection of existing utilities.

As noted on page D.17-28 of the Draft EIR/EIS, SCE is required to contact a regional notification center at least two days prior to excavation of any subsurface installation by Section 1, Chapter 3.1, "Protection of Underground Infrastructure," Article 2 of California Government Code §§4216-4216.9. In addition, in Section D.17 (Utilities and Public Services) of the EIS, Mitigation Measure UPS-2a (Protect pipelines and overhead and underground utilities) would require SCE to perform engineering studies to determine whether and what cathodic protection would be necessary to protect existing pipelines potentially affected. Evidence of coordination with all pipeline and utility owners with facilities in the vicinity of planned construction, including their review of SCE's construction plans and a description of any protective measures or compensation to be implemented to protect affected facilities, is also required as a part of Mitigation Measure UPS-2a. The commenter's concurrence with these measures is noted.

Comment Set B2 – Seven Oaks Medical Center

Comment Form

West of Devers Upgrade Project

Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:
<http://www.cpuc.ca.gov/environment/info/aspn/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 8/27/15

Name*: John Steinmann

Affiliation (if any)*: Seven Oaks Medical Center, Advanced Ambulatory Surgery Center, Arrowhead Orthopaedics

Address*: 1901 W Lugonia Ave

City, State, Zip Code*: Redlands, CA 92374

Telephone Number*: 909-557-2360

Email*: jsteinmann@renovis-surgical.com

Comment*: See below:

To whom it may concern,

We have developed a 50,000 sq ft Class A Medical Office building and Surgery Center on the corner of Nevada and Lugonia Ave in Redlands. The proposed project is anticipated to bring a 66kV line along the our eastern property line. Please accept our opposition to this occurrence for the following reasons:

1. We have a surgery center using digital and wireless monitoring within 80 ft of the proposed lines. We oppose any development that might place our patients at risk.
2. Overhead lines are unsightly and would diminish the value of our investment. We have spent a great deal of money to construct a first class medical office building and should not have the aesthetics of this building affected when an underground alternative must be available.

We all come to work and switch on the light and cool our space and are indebted to the work of SCE for providing this to us. We simply request that this project not put our patients at risk and respect the efforts we have made to construct a first class facility.

John Steinmann

Please send me notifications by: email mail I do not want to be on the project mailing list

*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please submit comments no later than September 22, 2015. You may also submit comments by email to westofdevers@aspneng.com or by phone (888) 456-0254.

B2-1

B2-2

Responses to Comment Set B2 – Seven Oaks Medical Center (John Steinmann)

B2-1 The commenter is concerned that the Proposed Project could interfere with digital and wireless monitoring at the medical office building and surgery center (“Medical Facility”) located on the southwest corner of intersection of Nevada Street and W. Lugonia Avenue in Redlands. The 66 kV subtransmission line proposed in this area would be located on poles a minimum of approximately 130 feet from the Medical Facility itself, separated by a parking lot that surrounds the Medical Facility building. Although SCE has not provided modeling of an estimated field level at a 130 foot distance, it is likely that the fields from the 66 kV line would be substantially diminished and would not create any issues for equipment within the facility.

However, in the event that the energized subtransmission line does create interference with radio, television, communications, or electronic equipment, Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and Resolve Electronic Interference Complaints) have been included in Section D.21 (Electrical Interference and Safety) of the EIS and would apply for the life of the project and reduce any such potential impact. Mitigation Measure EIS-1a requires use of the Institute of Electrical and Electronic Engineers Radio Noise Design Guide for limiting the conductor surface gradient. Mitigation Measure EIS-1b requires SCE to respond to, document, and resolve radio/television/electronic equipment interference complaints received. In sum, given the distance between the Medical Facility and the subtransmission line interference by the project with digital and wireless monitoring or the calibration of equipment at the Medical Facility is not expected, and should any interference issues arise Mitigation Measure EIS-1b requires SCE to respond, document and resolve interference complaints.

B2-2 The commenter is concerned that the project will diminish the value of his investment because overhead lines are allegedly unsightly and an underground alternative must be available.

The commenter’s Medical Facility is at the southwest corner of West Lugonia Avenue and Nevada Street in Redlands. Two poles would be installed along Nevada Street adjacent to the property to support a 66 kV subtransmission line. The poles would be over 130 feet from the building itself, separated by a parking lot that surrounds the building. Street trees and light standards are present along the street. The EIS addresses property values in Section D.8.3.3 (Socioeconomics and Environmental Justice, Impacts and Mitigation Measures). See in particular the discussion for Impact SE-5 (Construction of the project could adversely affect property values), where a review of pertinent literature on the subject is provided. The comment does not provide any information or evidence that would change the EIS conclusion that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property value. Also, please see Response to Comment B3-3 and General Response GR-5 (Property Values) for additional information.

Section D.18 (Visual Resources) in the EIS discusses impacts to visual resources from the 66 kV subtransmission line. The majority of construction activities and equipment brought into the Proposed Project study area and onto the Proposed Project sites would be temporary in nature and would, therefore, not result in a substantial long-term visual impact. As mentioned above, street trees and light standards are present along the street which would serve to partially screen views of the new tubular steel poles and lightweight steel/wood poles. Given this and the commercial nature of the property, the Final EIS concludes that the

resulting visual change or contrast in the context of the existing landscape's visual would not be substantial.

Development of an underground alternative in this area is not necessary to avoid or substantially lessen effects of the Proposed Project. Therefore an underground alternative at this location has not been evaluated in the EIS, because it clearly would not meet the alternatives screening criteria described in EIS Appendix 5, Section 2 (Description of Alternatives Evaluation Process).

Comment Set B3 – Arrowhead Orthopaedics



James D. Matiko, MD, FFAOS	Paul D. Burton, DO, FAOAO	Bret C. Powers, DO, FAOAO	David H. Dony, MD, FFAOS	Heidi Turpen-Folks, PA-C
Clifford D. Merkel, MD, FFAOS	Gail E. Hopkins II, MD, FFAOS	Asghar Husain, MD, FFAOS	Allen Gustafson, MD, FFAOS	Christina MacLean, PA-C
John C. Steinmann, DO, FAOAO	John W. Skubic, MD, FFAOS	Jay N. Shah, MD, FFAOS	Sang V. Le, MD	Pamela Moore, PA-C
Ronny G. Ghazal, MD, FFAOS	Jonathan K. Lee, MD, FAAPMR	Zachary S. Hadley, MD, FFAOS	Michael O'Shea, DPM, FACFAS	Eric Wagoner, PA-C
Barry S. Grames, MD, FFAOS	Andrew S. Wong, MD, FFAOS	Peter G. Elissy, MD, FFAOS	James R. LaRose, DPM, FACFAS	
Gary K. Frykman, MD, FFAOS	Roy J. Caputo, MD, FFAOS	Connor R. LaRose, MD, FFAOS	Scott R. Strum, MD, FAAPMR	Nabil Y. Razzouk, Ph. D., CEO
Richard A. Biama, MD, FFAOS	Wade Faerber, DO, FAOAO	Lawrence R. Walker, MD, FFAOS	Jonathan Allen, MD	

September 11, 2015

To whom it may concern,

Re: Proposed West of Devers Upgrade Project

We are appalled at the suggestion that SCE finds it necessary in the twenty first century to string another set of heavy voltage wires over a very busy corridor disrespecting established routes of travel and disrupting the operation of existing service organizations that could be negatively impacted.

B3-1

Arrowhead Orthopaedics is a Multi-subspecialty group of Orthopaedics surgeons. We occupy around 50,000 sq. ft. of Class A Medical office building at the corner of Nevada and Lugonia, and operate a busy surgery center and a diagnostic imaging center in the same building.

Our opposition to the proposed project as presented stems from three major concerns:

1. First, is related to our growing dependence on digital and wireless networking within our premises. Stringing high voltage wires less than 80 feet from our facility will significantly impact the calibration of our equipment and diminish our capability to provide quality medical and surgical care to our patients.
2. Secondly, there is some established evidence of correlation between incidents of cancer among those working or living in proximity of such high-voltage wires. As a healthcare organization, we would not want to expose our patients and staff to such unnecessary danger. Where such projects exist, SCE seem to have acquired sufficient easements that seem to keep away residential or commercial activity and thus minimize the risk. In this incident we do not have the option of packing and leaving the impacted corridor.
3. Thirdly, we are concerned about the fact that such project will undoubtedly devalue our existing property and introduce an unsightly fixture to our environment.

B3-2

B3-3

We have known SCE to be an innovative organization and one that is considerate of the environment and the people who share space with the company's projects. Thus we urge SCE to use the same level of ingenuity and consideration in the design and implementation of this project by routing it to where there is less established human activity.

Thank you for your consideration.

Nabil Y. Razzouk, Ph.D.
 CEO

ARTHROSCOPY • HAND • SPINE • FOOT & ANKLE • TRAUMA • SPORTS MEDICINE • JOINT REPLACEMENT • PODIATRY • PAIN MANAGEMENT • WORK COMP

Administrative Office 1901 W. Lugonia Ave., 230 Redlands, CA 92374 T: (909) 557-1600 F: (909) 557-1740	1901 W. Lugonia Ave., 120, 210, 240, 310 Redlands, CA 92374 T: (909) 557-1600 F: (909) 890-0218	2131 Elks Drive, 200 San Bernardino, CA 92404 T: (909) 726-6100 F: (909) 557-1745	4234 Riverwalk Pkwy., 200 Riverside, CA 92505 T: (951) 977-2500 F: (951) 684-1678	5889 West Stetson Ave., 100 Hemet, CA 92545 T: (951) 652-1600 F: (951) 652-2922	8805 Haven Ave., 200 Rancho Cucamonga, CA 91730 T: (909) 912-1750 F: (909) 989-4477	29099 Hospital Rd., 114 Lake Arrowhead, CA 92352 T: (909) 336-3694 F: (909) 336-6541	15095 Amargosa Rd., 106 Victorville, CA 92394 T: (760) 245-6495 F: (760) 493-3223
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www.arrowheadortho.com

Responses to Comment Set B3 – Arrowhead Orthopaedics

- B3-1 The commenter is concerned about alleged impacts on the calibration of equipment from the proposed 66 kV subtransmission line and a diminished capacity to provide quality care to patients at the Medical Facility. Please see Response to Comment B2-1.
- B3-2 The commenter is concerned about alleged incidents of cancer among those living or working in proximity to high-voltage wires. Please see General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF), including health effects.
- B3-3 The commenter is concerned that the project will devalue his office building property at the Medical Facility and introduce an unsightly fixture into his environment.

The Medical Facility property is at the southwest corner of West Lugonia Avenue and Nevada Street in Redlands. Two poles would be installed along Nevada Street adjacent to the property to support a 66 kV subtransmission line. The poles would be over 130 feet from the building itself, separated by a parking lot that surrounds the building. Street trees and light standards currently exist along the road. The EIS addresses Proposed Project's effect on property values in Chapter D.8 Socioeconomics and Environmental Justice, in Section D.8.3.3 (Impacts and Mitigation Measures). In particular see the discussion for Impact SE-5, Construction of the project could adversely affect property values, where a review of pertinent literature on the subject is provided. The comment does not provide any information or evidence that would change the EIS conclusion that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property values. No change in the document has occurred as a result of this comment.

Comment Set B4 – Palen Solar Holdings LLC

GOODIN,
MACBRIDE,
SQUERI & DAY, LLP

Michael B. Day, Attorney at Law

September 22, 2015

Billie C. Blanchard / Frank McMenimen
CPUC / BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: Comments of Palen Solar Holdings, LLC on the Draft Environmental Impact Report for the West of Devers Upgrade Project

Dear Ms. Blanchard and Mr. McMenimen:

In accordance with the August 7, 2015 Notice of Availability of the Draft Environmental Impact Report/Environmental Impact Statement (“DEIR/EIS”) on Southern California Edison Company’s (“SCE”) application to build and operate the West of Devers Upgrade Project (“WODUP”), Palen Solar Holdings, LLC (“Palen Solar”) submits its comments on the DEIR/EIS.

Palen Solar has a significant interest in the WODUP because Palen Solar anticipates interconnecting its 500 MW solar thermal project (“Palen Project”) with the Red Bluff Substation and, according to the Palen Project’s Large Generator Interconnection Agreement (“LGIA”), the WODUP must be completed in order for the Palen Project to achieve Full Capacity Deliverability Status. Under SCE’s proposal (“Proposed Project”), SCE will remove its existing 220 kV transmission lines and replace them with higher capacity lines, upgrade its substations, and remove and relocate some of its 66 kV subtransmission lines and 12 kV distribution lines in the Blythe and Desert Center areas. Currently, the transmission lines in the Blythe and Desert Center areas have a total power transfer capability of 1,600 MW. SCE proposes increasing its power transfer capability in these areas by 3,200 MW to achieve a total transfer capability of 4,800 MW.

The DEIR/EIS finds SCE’s Proposed Project to be the “least environmentally preferred” option.¹ Instead of supporting the Proposed Project, the DEIR/EIS proposes other environmentally-preferred alternatives. It declares the “Environmentally Superior Alternative” to be the Phased Build Alternative; the “Second Preferred Alternative” is a combination of the Tower Relocation Alternative, the Iowa Street 66 kV “Underground Alternative,” and SCE’s Proposed Project.

¹ DEIR/EIS, Executive Summary at ES-1.

B4-1

Comment Set B4 – Palen Solar Holdings LLC (cont.)

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Palen Solar believes the Phased Build Alternative must be reevaluated to properly account for SCE’s need for 4,800 MW of total transfer capability. Any other alternative should also recognize the 4,800 MW total transfer capability need as one of the project’s primary objectives. Furthermore, the Phased Build Alternative must consider the environmental impact of any future phases that will allow for a 4,800 MW total transfer capability; failure to do so violates the California Environmental Quality Act’s (“CEQA”) prohibition against a piecemeal review of alternative options. Finally, Palen Solar requests confirmation that any alternatives will allow full deliverability for its 500 MW Palen Project and clarification of the length of delays any alternatives will cause.

B4-1
cont.

Palen Solar urges correcting the deficiencies in the DEIR/EIS’s analysis and selecting SCE’s Proposed Project as environmentally superior. If the final Environmental Impact Report/Environmental Impact Statement (“EIR/EIS”) finds the Proposed Project as not environmentally superior, the California Public Utilities Commission (“CPUC”) / Bureau of Land Management (“BLM”) should adopt a Statement of Overriding Consideration showing that the benefits of the Proposed Project justify its approval. While the Proposed Project will, like any construction project, have some environmental concerns, the benefit the Proposed Project will produce outweighs its impacts. Alternatively, the Second Preferred Alternative should be selected as the Environmentally Superior Alternative. The final result should find the Phased Build Alternative as not viable for the reasons expressed below.

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

The DEIR/EIS is fundamentally flawed and based on inadequate analysis of project alternatives in place of SCE’s WODUP. The DEIR/EIS fails to account for SCE’s objective to increase total transfer capability in the transmission corridor to be 4,800 MW and improperly analyzes project alternatives in piecemeal fashion. The final EIR/EIS, instead, should find SCE’s Proposed Project to be environmentally superior. If the final EIR/EIS identifies another alternative as the Environmentally Superior Alternative, it must take into account SCE’s need for 4,800 MW total transfer capability and not conduct a piecemeal environmental review.

Fundamental Flaws in the DEIR/EIS

1. The DEIR/EIS Fails to Properly Incorporate SCE’s Primary Objective to Obtain 4,800 MW of Total Transfer Capability

Both the Phased Build Alternative and the Second Preferred Alternative fail to meet one of SCE’s primary objectives: to increase total transfer capability in the corridor to 4,800 MW. The Phased Build Alternative and Second Preferred Alternative identify three project objectives: (1) to increase system deliverability; (2) to support goals for renewable energy; and (3) to maximize any remaining space within the corridor.² These objectives are derived from an

² *Id.*, Section C at C-19 to C-20, C-26.

Comment Set B4 – Palen Solar Holdings LLC (cont.)

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earlier discussion in Section A that identifies six project objectives for SCE.³ The three CPUC / BLM project objectives are distilled from what the DEIR/EIS identifies as SCE’s six objectives.⁴ While the DEIR/EIS’s objectives recognize *a need* to increase system deliverability, none of the objectives acknowledge SCE’s *specifically stated need* for a total transfer capability of 4,800 MW.

B4-1
cont.

The Phased Build Alternative’s First Objective Does Not Meet the Capacity Requirements for Full Transfer Capability

The DEIR/EIS identifies the first objective of the Proposed Project as allowing SCE “to meet its obligations to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.”⁵ This ostensibly requires a project build-out to the 4,800 MW that SCE requires for full transfer capability. When describing the first Basic Project Objective under the Phased Build Alternative, however, the DEIR/EIS states that it “would allow SCE to fully deliver about 3,000 MW of the output from new generation projects”⁶ This is 1,800 MW less than the capacity SCE believes is required to ensure full deliverability for numerous generation projects in the Blythe and Desert Center areas. Though the DEIR/EIS states its 3,000 MW figure satisfies the California Independent System Operator’s (“CAISO”) 2024 Reliability Base Case, which includes specific generation projects the CAISO believes are most likely to be constructed,⁷ this analysis fails to include additional projects in the CAISO queue that are included in the CAISO planning processes.⁸ The DEIR/EIS further states this alternative is “technically feasible.”⁹ Technical feasibility, however, does not justify a shortfall of 1,800 MW.

This substantial shortfall is particularly surprising in light of the fact that the WODUP has always been planned as a 4,800 MW project, and has been included in the CAISO’s Transmission Planning Process (“TPP”) since 2010 at the 4,800 MW capacity. The final EIR/EIS should take into account SCE’s need for 4,800 MW of total transfer capability, which SCE has repeated continuously throughout this proceeding. SCE’s application for the Proposed Project, pending in front of the CPUC, states that achieving “full deliverability” of new generation projects in the area is a primary need.¹⁰ The application is clear that to meet this need requires SCE to increase the transfer capability by 3,200 MW, which would result in a total

³ *Id.*, Section A at A-5.

⁴ *Id.*, Section A at A-11 to A-13.

⁵ *Id.*, Section A at A-5.

⁶ *Id.*, Section C at C-26. This objective is categorized as “Increase system deliverability.”

⁷ *Ibid.*

⁸ *See id.*, Section A at A-9 to A-10, Table A-4. The Phased Build Alternative would only allow an increase in deliverability by 1,400 MW, yet the DEIR/EIS’s Table 4 recognizes that there is a total of 4,961 MW of planned or on-hold generation projects seeking to rely on the WODUP. *See ibid*; *see also id.*, Section C at C-26.

⁹ DEIR/EIS, Section C at C-26.

¹⁰ Application (A.)13-10-020 at 2 (emphasis added).

Comment Set B4 – Palen Solar Holdings LLC (cont.)

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transfer capability of 4,800 MW.¹¹ SCE's Proponent's Environmental Assessment also states a need for a total transfer capability of 4,800 MW.¹² Additionally, when the CPUC sent a data request to SCE to better understand SCE's objectives, SCE replied that a primary need was to have a total transfer capability of 4,800 MW.¹³

B4-1
cont.

The DEIR/EIS's CPUC / BLM Objectives Must be Revised to Reflect SCE's 4,800 MW Transfer Capability Need

The Phased Build Alternative's conclusion that a total transfer capability of only 3,000 MW and not 4,800 MW will meet the objectives of the WODUP is unfounded. SCE has stated numerous times that it needs to construct a project with a total transfer capability of 4,800 MW. The DEIR/EIS even identifies the purpose of the WODUP as increasing total transfer capabilities to 4,800 MW.¹⁴ It then goes on to state that "[i]ncreasing the system transfer capacity in the corridor is SCE's proposed solution to achieving its Project Objectives, and to integrate growth in generation."¹⁵

Accordingly, the CPUC and BLM should be well aware that an alternative calling for anything less than 4,800 MW would be a serious concern for SCE. It is also a serious concern for renewable generation owners such as Palen Solar that are relying on the WODUP for interconnection and full deliverability status. The DEIR/EIS's failure to include the required 4,800 MW of total transfer capacity in the project objectives must be remedied.

The Total Transfer Capability in the Tower Relocation Alternative and Underground Alternative Must be Clarified to Include a Total Transfer Capability of 4,800 MW

B4-2

The DEIR/EIS is unclear as to whether the Second Preferred Alternative would provide a total transfer capability of 4,800 MW. While the Tower Relocation Alternative would provide "the same transfer capability and deliverability as the Proposed Project,"¹⁶ the same is not apparent for the Underground Alternative. The final EIR/EIS must clarify that the Underground Alternative will allow a total transfer capability of 4,800 MW. If the Underground Alternative cannot allow for a total transfer capability of 4,800 MW, it cannot be considered a viable project alternative in the final EIR/EIS.

¹¹ *Ibid.*

¹² Southern California Edison's West of Devers Upgrade Project, *Proponent's Environmental Assessment*, Section 1.0 "Purpose and Need" at 1-16.

¹³ *Response to SCE Data Request #8*, Data Response PD-24 A (Oct. 14, 2014).

¹⁴ DEIR/EIS, Section A at A-5, *Review of SCE's Purpose and Need*.

¹⁵ *Ibid.*

¹⁶ *Id.*, Section C at C-19.

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Basic Project Objective 1 for both the Tower Relocation Alternative and the Underground Alternative must also be revised to explicitly declare a need for 4,800 MW of total transfer capability. Even if the final EIR/EIS concludes these alternatives would allow for a total transfer capability of 4,800 MW, not altering Basic Project Objective 1 to reflect this objective would be unsatisfactory. The final EIR/EIS for both of these alternatives should assure (1) a primary objective of 4,800 MW total transfer capability and (2) that the actual alternatives will allow for a total transfer capability of 4,800 MW.

B4-2
cont.

2. The Phased Build Alternative Includes an Improper Piecemeal Review Prohibited by CEQA

B4-3

Under CEQA, the lead agency must conduct an EIR/EIS when construction of a proposed project will have a significant environmental effect.¹⁷ The EIR/EIS cannot break up a project and analyze certain aspects while excluding analysis of other aspects in order to find the proposed alternatives will have a less significant environmental impact. Such piecemeal review is prohibited under CEQA. The California Supreme Court has established a two-part test to ensure an EIR/EIS does not undergo a piecemeal review:

[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project, and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.¹⁸

The DEIR/EIS states that the Phased Build Alternative will “[a]llow for future capacity expansions of the existing corridor *with several options for future phases.*”¹⁹ The DEIR/EIS, however, does not analyze the environmental impact of these future phases. Under the *Laurel Heights* two-part test, the final EIR/EIS must consider these future phases.

First, it is reasonably foreseeable that the WODUP will need additional transfer capability above 3,000 MW to account for other generation projects not considered in the Phased Build Alternative. Many of these generation projects not considered have either entered into LGIAs with SCE, have begun negotiations for LGIAs, or anticipate interconnecting with the WODUP.²⁰ The DEIR/EIS therefore acknowledges it is reasonably foreseeable that additional transfer capacity above 3,000 MW will be needed in the future. Furthermore, the Legislature’s recent passage of SB 350, which requires a Renewable Portfolio Standard of 50 percent by 2030,

¹⁷ Cal. Pub. Resources Code § 21100.

¹⁸ *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.*, 47 Cal. 3d 376, 396 (1988).

¹⁹ DEIR/EIS, Section C at C-25 (emphasis added).

²⁰ *Id.*, Section A at A-8; see also *id.* at A-9 to A-10, Table A-4.

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makes it even more likely that future renewable generation facilities will need to interconnect to transmission lines such as the WODUP.²¹

B4-3
cont.

Second, any future expansion occurring through future phases will have environmental impacts. If SCE is required to undertake a second phase under the Phased Build Alternative to increase total transfer capability, SCE will have to re-mobilize construction crews. After re-mobilization, additional rounds of construction will occur. The Phased Build Alternative is only an interim solution to mitigate short-term environmental consequences. In the long run the Phased Build Alternative delays an inevitable increase in transfer capacity, which would then require additional environmental disturbance. The Phased Build Alternative would be more environmentally destructive than the Proposed Project, as it would require construction crews to mobilize and undertake construction more than once. As a result of the additional impacts caused by phasing the work that will be required for full buildout, Palen Solar contends that the superior environmental option is SCE's Proposed Project, which only requires mobilization, construction, and expansion of the WODUP in one single construction project. Because the DEIR/EIS clearly anticipates future phases in the Phased Build Alternative, CEQA mandates that the final EIR/EIS must analyze the "environmental effects of future expansion"²²

3. Developers with CAISO Queue Positions or LGIAs Need Assurance They Will Receive Timely, Full Capacity Deliverability Status

B4-4

The DEIR/EIS is unclear whether developers with CAISO queue positions or developers with executed LGIAs will receive full capacity deliverability status. It is also unclear whether developers will receive full capacity deliverability status in the timeframe proposed in SCE's CPUC application or whether the alternatives proposed in the DEIR/EIS will cause substantial delay. In keeping with the State policy to support renewable development, the CPUC / BLM should work with the California Energy Commission and CAISO to coordinate transmission planning and to inform project developers of changes in project schedules.²³ Working together will ensure that developers are not blindsided by changes to transmission projects that may negatively affect the deliverability of their particular renewable project. The WODUP was always designed as a 4,800 MW project; the Phased Build Alternative causes great disruption and surprise by proposing a project that reduces that capacity. The CPUC's final decision on the application cannot adopt the DEIR/EIS's recommendation without ensuring that it does not have a negative effect on existing planned projects, like the Palen Project. As of now, the CAISO cannot give Palen Solar assurance that the Phased Build Alternative will not

²¹ Sen. Bill No. 350 (2015-2016 Reg. Sess.) § 2. While the governor has yet to act on SB 350, by the time the final EIR/EIS is released the final results of the legislation will be available. The final EIR/EIS should take the legislation into account.

²² See DEIR/EIS, Section C at C-25; *Laurel Heights*, 47 Cal. 3d at 396.

²³ See *Alignment of Key Infrastructure Planning Processes by CPUC, CEC and CAISO Staff*, available at <http://www.cpuc.ca.gov/NR/rdonlyres/367DF06D-05A4-4819-A632-1AF64368A0D4/0/ProcessAlignmentText.pdf> (Dec. 23, 2014).

Comment Set B4 – Palen Solar Holdings LLC (cont.)

Billie C. Blanchard / Frank McMenimen
September 22, 2015
Page 7

negatively affect the Palen Project. Palen Solar requests the final EIR/EIS to include assurance that any viable alternatives in the final EIR/EIS will allow the Palen Project to have timely, full 500 MW deliverability into the WODUP.

B4-4
cont.

4. The DEIR/EIS's Alternatives Fail to Account for any Necessary Capacity for WODUP Upgrades and Fail to Use Policy-Driven Scenarios

B4-5

The DEIR/EIS Phased Build Alternative does not consider many presently known projects that will require transmission access that will affect deliverability in the region if the total transfer capability is less than 4,800 MW. For instance, the CPUC / BLM should be aware of the 985 MW interim West of Devers project that the DEIR/EIS does not include as necessary capacity for the WODUP.²⁴ Furthermore, while the DEIR/EIS relies on the CAISO 2024 Reliability Base Case, it does not use any policy-driven scenarios.²⁵ For example, in a recent data request from the Office of Ratepayer Advocates, it asks how the DEIR/EIS determined a level of need for the WODUP. The response states the DEIR/EIS “does not determine or define any level of need for the proposed [WODUP].”²⁶ Palen Solar has not had the time to conduct a full scale analysis of any errors the DEIR/EIS made when evaluating deliverability inputs. Palen Solar urges the CPUC / BLM to closely examine whether there are omissions or incorrect assumptions regarding deliverability in the DEIR/EIS.

5. The Final EIR/EIS Should Consider State Policies Calling for Development of New Renewable Generation Projects

B4-6

The final EIR/EIS should align with State policy and consider new renewable generation projects likely to come online. As mentioned above, the Legislature recently passed SB 350 that requires a 50 percent RPS by 2030.²⁷ Passage of the bill reflects the State’s policy goals to increase the number of new renewable generation projects in the future. The State, however, cannot achieve this policy if projects such as the WODUP do not allow full deliverability for renewable generation. Many renewable generation projects, especially solar generation, are located along the I-10 corridor and further east. The WODUP is designed to deliver generation from these projects into the electrical grid. Considering the State policy to increase renewable generation makes the Phased Build Alternative an unviable option. The 3,000 MW transfer capability is too small to allow deliverability of future generation in the area.

²⁴ See A.13-10-020, *Southern California Edison Company's Direct Testimony on Need, 399.2.5, Maximum Cost, Field Management Plan, and Amended Direct Testimony on the Proposed Transaction for the West of Devers Upgrade Project* at 5, available at [http://www3.sce.com/sscc/law/dis/dbattach5e.nsf/0/EABFC727A8AF4E1C88257E2A0082BFFC/\\$FILE/A1310020%20WOD%20-%20SCE%20Direct%20Testimony.pdf](http://www3.sce.com/sscc/law/dis/dbattach5e.nsf/0/EABFC727A8AF4E1C88257E2A0082BFFC/$FILE/A1310020%20WOD%20-%20SCE%20Direct%20Testimony.pdf) (April 17, 2015).

²⁵ DEIR/EIS, Section C at C-25 to C-26.

²⁶ *Response to Office of Ratepayer Advocates Data Request #1* (Sept. 15, 2015).

²⁷ See *supra* at fn. 22.

Comment Set B4 – Palen Solar Holdings LLC (cont.)

Billie C. Blanchard / Frank McMenimen
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The DEIR/EIS’s failure to allow for 4,800 MW of total transfer capability under the first objective also conflicts with the second CPUC / BLM objective of supporting renewable generation goals.²⁸ The best way to account for increasing renewable generation is to maximize deliverability of the WODUP. Therefore, the final EIR/EIS must include SCE’s need for 4,800 MW of total transfer capability and should exclude any alternatives not meeting this criteria as unviable.

B4-6
cont.

6. Other Issues the Final EIR/EIS Should Address

B4-7

Palen Solar also requests the final EIR/EIS address two additional matters:

- a. The DEIR/EIS states the Palen Project “may propose a 250 MW power tower.”²⁹ This information is incorrect. Palen Solar requests the final EIR/EIS include an updated finding that the California Energy Commission has approved a construction extension of the Palen Project. Such approval contemplates a 500 MW project, which, in turn, will require a full 500 MW of deliverability when the project is complete.³⁰
- b. Clarification that is more specific and includes estimated dates regarding how much each alternative could delay completion of the WODUP.

B4-8

Very truly yours,

GOODIN, MACBRIDE,
SQUERI & DAY, LLP



Michael B. Day
Counsel for Palen Solar Holdings,
LLC

cc: Service List, A.13-10-020

3496/002/X175389.v1

²⁸ See DEIR/EIS, Section C at C-26.

²⁹ *Id.*, Section A at A-9, Table A-4.

³⁰ See *California Energy Commission - Tracking Progress*, “Renewable Energy Facility Siting in California” at 17, available at http://www.energy.ca.gov/renewables/tracking_progress/documents/renewable.pdf (Sept. 3, 2015); see also California Energy Commission, *Order Granting Extension of Time to Construct*, Docket No. 09-AFC-7C (Sept. 16, 2015).

Responses to Comment Set B4 – Palen Solar Holdings LLC

B4-1 This comment asserts that the agency-defined project objectives must be revised to reflect SCE's proposed transfer capability of 4,800 MW. The comment introduces other individual concerns that are addressed in the following individual responses, primarily by suggesting that the Phased Build Alternative should be evaluated in light of a presumed need for 4,800 MW of total transfer capability. Achieving deliverability specifically for the 500 MW Palen project is addressed in Response to Comment B4-4, and the potential for delays is addressed in Response to Comment B4-8.

The comment claims the EIS requires analysis of the impacts of "future phases" of construction that could occur under the Phased Build Alternative. [In its EIR, the CPUC also responds to this comment with regard to CEQA.] This topic is addressed in Response to Comment F1-13 (SCE's cover letter), and additional and updated information on the topic of upgrading the corridor after the implementation of the Phased Build Alternative appears in General Response GR-4.

The comment reflects the opinion that any alternative satisfying Basic Project Objective 1 would not satisfy the level of presumed need. See General Response GR-1 on the level of project need. The EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity). General Response GR-2 notes that the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals.

Please refer to GR-2 for more information on the rationale for the CPUC and BLM Basic Project Objectives used in the process of developing a reasonable range of alternatives for the environmental review process.

B4-2 The comment asserts that the Draft EIR/EIS is unclear in its discussion of the total transfer capability of the Tower Relocation and Iowa Street 66 kV Underground Alternatives. These alternatives are described in Section 4.2 and Section 4.3, respectively, of EIS Appendix 5 (Alternatives Screening Report) where the discussion clearly states they would provide the same transfer capability and deliverability as the Proposed Project.

The comment requests revision of Basic Project Objective 1 "to explicitly declare a need for 4,800 MW of total transfer capability." This request reflects the opinion that alternatives to the Proposed Project cannot be considered as viable project alternatives unless that level of need is achieved. As noted in General Response GR-1, and in Response to Comment B4-1, it is not appropriate for the EIS to attempt to define the overall level of need or to speculate on the level of development that must be accommodated. Additionally, see General Response GR-2 on the topic of ensuring that the scope of alternatives is not unduly limited.

B4-3 The commenter believes the Phased Build Alternative includes an improper piecemeal review that is prohibited by CEQA. Please see Response to Comment F1-13.

B4-4 The comment asserts that the EIS should provide assurances for developers of generation projects seeking Full Capacity Deliverability Status (FCDS). A wide range of generation and transmission projects that contribute to the need for the Proposed Project appear in the EIS (Table A-4, Projects Contributing to Need for WOD Upgrade Project). Additionally, the EIS, in Section B.7.1, Definition of Connected Action Projects, recognizes that the 500 MW Palen project is closely related to the Proposed Project, and it is considered to be a "connected

action” under NEPA. The Palen project is shown in EIS Table A-6 (Project Analysis Determinations) and Table B-22 (Connected Actions – Solar Generation Projects).

As noted in General Response GR-1, it is not appropriate for the EIS to attempt to define the overall level of need or to speculate on the level of development that must be accommodated. Similarly, it is not appropriate for the EIS to assure that the Proposed Project or an alternative would guarantee the full deliverability status for any single individual project.

Consideration of Basic Project Objective 1 in EIS Appendix 5 (Alternatives Screening Report) includes Table Ap.5-3 (Projects Accommodated by the Phased Build Alternative), which shows projects likely to be made deliverable by the Phased Build Alternative, and the Palen project is shown as likely to be accommodated. Conducting a formal study of deliverability is beyond the scope of the EIS. While the EIS does not include a determination of deliverability, the EIS clearly assumes that the Palen project would be more likely to be developed successfully if the Proposed Project or an alternative is built. See General Response GR-3 for a discussion of the CAISO Transmission Planning Process and how renewable energy would be accommodated by the Phased Build Alternative.

B4-5 The comment asserts that the Phased Build Alternative does not consider many presently known generation projects. Response to Comment B4-4 describes the various components of the EIS discussing the full range of generation and transmission projects contributing to the need for the Proposed Project. These projects range from “connected actions” to cumulative projects (Section E) and projects that could fill a remaining growth-inducing capacity (Section A.3, Definition of Connected Actions and Related Projects). The EIS considers that the 2013 West of Devers Interim Project presently provides deliverability to 985 MW of installed renewable generation in the baseline conditions (EIS Section B.1.1), and this facility is not part of the power flow modeling of the alternative. This topic is also addressed in Response to Comment B9-5 (CAISO comment). See General Response GR-3 on the use of renewable energy resource portfolios from the transmission planning process as it relates to project-level environmental review.

B4-6 The comment requests consideration of California’s evolving policies to increase the renewable energy supply. The comment states that California’s renewable energy goals cannot be achieved without transmission facilities that allow “full deliverability,” and repeats the opinion that the Phased Build Alternative is “unviable” because it would have a lower capacity than the Proposed Project.

Response to Comment B4-1 addresses the concern that the capacity of the Phased Build Alternative would not be the same as SCE’s proposed transfer capability. See also General Response GR-1 regarding the topic of the feasibility of the alternative and the scope of the CPUC evidentiary hearing, and General Response GR-3 for a discussion of achieving California’s future renewable energy goals in light of Senate Bill 350 (2015).

B4-7 The comment requests the status of the Palen Project be updated based on approvals of the project by the Energy Commission. The comment also notes that the updated project would be for 500 MW.

In Section A.2.2 (Introduction, BLM’s Purpose and Need), Table A-4 (Projects Contributing to Need for WOD Upgrade Project) has been updated to reflect the Energy Commission’s extension of time to construct the Palen Project. The project is identified as a 500 MW project in Table A-4 so no change in project size is necessary. Section B.7 (Description of the Proposed

Project, Connected Action), including Table B-22 (Connected Actions – Solar Generation Projects) and Section B.7.2.1 (Connected Actions, Known Projects) and the analysis of the Connected Actions throughout Section D have been updated to reflect the revised status of the Palen Solar Project.

B4-8 The commenter requests clarification that is more specific and includes estimated dates regarding how much each alternative could delay completion of the project.

As stated in EIS Section B.3.10 (Description of the Project, Construction Schedule and Sequence), SCE anticipates that construction of the Proposed Project would take approximately 36-48 months following receipt of CPUC and BLM approvals, completion of final engineering and procurement activities, acquisition of any necessary property rights, and receipt of other applicable permits.

Compared to the Proposed Project, “Construction Timeframe” is discussed under “Feasibility” for each alternative in Appendix 5 (Alternatives Screening Report) of the EIS. See Response to Comment F1-20 for a discussion of the construction schedule for the Phased Build Alternative in particular. This comment implies that selection of the Phased Build Alternative would delay the in-service date. With the configuration described in the EIS, SCE’s November 2015 response to Data Request 17 (ALT-29) indicates that the Phased Build Alternative would have a similar construction timeline as the Proposed Project.

Comment Set B5 – Natural Resources Defense Council



September 22, 2015

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
E-mail: westofdevers@aspenev.com

RE: Comments of NRDC on West of Devers Draft EIS

Introduction

I am writing on behalf of the Natural Resources Defense Council (NRDC) to recommend modifying the preferred recommendation on the Draft Environmental Impact Statement to preserve lower cost and less environmentally impactful development in the West of Devers corridor to meet present and expected future renewable energy development. The preferred alternative reduces the value of this upgrade by limiting ability to expand the lines in the future within a precious, already existing corridor that has the capacity to do so. These limitations will increase costs, slow the pace of renewable deployment, and potentially precipitate the need to find additional rights of way in a sorely congested part of the state.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's air, water, lands and wildlife resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

Future needs and state policy goals not fully considered by the DEIS

NRDC supports the plan to expand this transmission because it is a crucial to our ability to meet present and future renewable energy and greenhouse gas (GhG) reduction goals. The selected route makes efficient use of existing corridors and has the fewest environmental impacts. It is supported by the Morongo Tribe, whose partnership with Southern California Edison is a landmark in utility-tribal transmission coordination. The proposed project would facilitate development of large scale solar in the Blythe and Desert Center areas, and was identified as an important transmission upgrade in the Renewable Energy Transmission Initiative (RETI), on which NRDC served.

B5-1

NATURAL RESOURCES DEFENSE COUNCIL

111 SUTTER STREET | SAN FRANCISCO, CA | 94104 | T 415.875.6100 | F 415.875.6161 | NRDC.ORG

Comment Set B5 – Natural Resources Defense Council (cont.)

Yet the Draft EIR's preferred alternative would reduce the proposed increase in transfer capacity a third. The full increase is needed to accommodate renewable generation currently under development and future development necessary to achieve both the existing 33% RPS mandate and the new 50% RPS mandate that was approved after the Draft EIR was published, as well as continued GhG emissions targets mandated by AB32 (80% reduction from 1990 levels by 2050). Meeting all these goals will require a carefully planned and robust transmission system serving all parts of our state. Areas with the fewest options for transmission expansion (such as the West of Devers area), would benefit the most from a master planned, long-range approach to transmission development. Failing to allow for these acknowledged and known state policy goals seriously undermines the value proposition of the proposed project and hampers critical state environmental programs.

NRDC has long been a proponent of master planning both procurement and transmission to meet present and future needs.¹ This approach is being considered by the California Energy Commission, CAISO and the CPUC as part of the RETI 2.0 process and the San Joaquin Valley renewable energy zone development process.

By mandating a second round of construction and outages close on the heels of the first round of construction and outages the phased alternative will increase consumer costs and is highly likely to unnecessarily delay renewable energy development needed to meet the state goals mentioned above. The draft EIR itself concedes that the environmental impacts from successive rounds of constructions is a disadvantage of the Phased Alternative. Phased development is often the preferred approach to meeting future needs when they are not clear but reasonably anticipated. In this case we believe the goals are explicit and clear, the needs evident and delaying the development of capacity we know we will need is unnecessary.

Sincerely,



Carl Zichella
Director of Western Transmission

¹ See COMMENTS OF THE NATURAL RESOURCES DEFENSE COUNCIL ON REALIGNING TRANSMISSION PLANNING TO MEET STATE CLIMATE MITIGATION AND RENEWABLE ENERGY GOALS, Order Instituting Rulemaking to Continue Implementation and Administration of the California Renewables Portfolio Standard Program, Rulemaking 11-05-005, November, 2014

B5-1
cont.

Responses to Comment Set B5 – Natural Resources Defense Council

B5-1 The comment recommends modifying the conclusion for the environmentally superior alternative and states that the alternative would limit the ability to expand the corridor in the future, potentially leading to a need to find additional rights of way. The EIS assesses the goal of maintaining adequate space within the corridor in the consideration of Basic Project Objective 3, and Section 4.4 of Appendix 5 (Alternatives Screening Report) notes that the Phased Build Alternative would meet this objective by removing the existing single-circuit towers to create space for future transmission lines.

The comment also suggests that the Phased Build Alternative would mandate a “second round” of construction and outages following the potential construction of the Phased Build Alternative. The comment is based on the presumption that future expanded transmission capacity would be needed within the corridor. The EIS notes the potential for future expansion within the corridor, to the extent that it may be found needed, in Section 4.4 of Appendix 5 (Alternatives Screening Report).

See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) for information on the level of potential “future” construction considered to be necessary or foreseeable at this time. General Response GR-1 notes that the overall level of project need will be addressed within the general proceeding.

More information regarding the need for additional environmental review of the Phased Build Alternative is discussed in Responses to Comments F1-12 and F1-13. See Response to Comment F1-11 in response to concerns regarding outages during construction of the Phased Build Alternative.

Comment Set B6 – Seven Oaks Medical Center (Tim Delinger)

Email: West of Devers Upgrade Project EIR/EIS Team

From: Tim Delinger <Tim.Delinger@Arrowheadortho.com>
Sent: Tuesday, September 22, 2015 12:13 PM
To: West Of Devers Project
Subject: Comment on West of Devers Project

Good afternoon,

I am writing on behalf of the Seven Oaks Medical Center which owns a 50,000 square foot Class A medical office building at 1901 W. Lugonia Avenue in Redlands. I recently attended an informational workshop on the SCE West of Devers Upgrade Project and am very concerned about the 66kV overhead lines that are proposed to be constructed along Nevada Avenue adjacent to the Seven Oaks Medical Center property. Due to the size of these overhead lines, I am very concerned about the potential impact of the lines on the property and surrounding environment, the tenants in the building, and particularly the patients and employees who visit and work in the building. Some of the tenants in the building include a surgery center that uses digital and wireless monitoring, a diagnostic imaging center, a mobile phone provider with antennas on the roof, and a large orthopaedic healthcare practice.

My understanding based on the informational workshop is that one of the proposed alternatives, the Phased Build Alternative, would revise the project so that lighter weight and higher capacity conductors would be installed on existing towers which would allow the re-use of most existing towers with minimal structural changes. This would eliminate major construction in many new areas in the community and would reduce the impact on current businesses, homeowners, and the local environment. Therefore, I would like to request that full consideration be given to this alternative so that the negative impacts from this project will be reduced. Obviously electrical needs are essential and upgrades are sometimes unavoidable, but since there is a viable alternative that can reduce the consequences of the upgrade on the community, it is apparent to me that this alternative should be thoroughly considered and subsequently implemented if it is not already the first choice.

I would like to stay informed on this project so please send me future notifications by email.

Thank you for your consideration,

Tim Delinger, MBA
1901 W. Lugonia Ave #230
Redlands, CA 92374
909-557-1603
tim.delinger@arrowheadortho.com

B6-1

Responses to Comment Set B6 – Seven Oaks Medical Center (Tim Delinger)

B6-1 The commenter writes regarding the same facility described in Comments B2 and B3 and expresses similar concerns. The commenter supports the Phase Build Alternative and requests to receive future notifications by email.

The commenter's support for the Phased Build Alternative is noted. Please refer to Responses to Comments B2-1, B3-1 and B3-2 regarding similar concerns about the Medical Facility building/property. The commenter is confirmed as being on the contact list for email notices.

Comment Set B7 – Independent Energy Producers Association

INDEPENDENT ENERGY PRODUCERS ASSOCIATION

September 22, 2015

VIA E-MAIL WESTOFDEVERS@ASPENEG.COM

Billie Blanchard and Frank McMenimen
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94014

Re: Comments of the Independent Energy Producers Association on Draft EIR/EIS for the West of Devers Transmission Upgrade Project

Dear Ms. Blanchard and Mr. McMenimen:

The Independent Energy Producers Association (IEP) has reviewed the Draft EIR/EIS for the proposed West of Devers Upgrade project and offers these comments on the Draft.

IEP has determined that the Draft's identification of the environmentally preferred alternative to the project as proposed may be short-sighted. As the Draft recognizes, renewable energy makes a significant contribution toward meeting California's greenhouse gas emissions reduction goals. As part of the State's effort to reduce greenhouse gas emissions, the Legislature has recently passed Senate Bill 350, which increases the Renewables Portfolio Standard to 50% of retail electricity sales by 2030, and the Governor is expected to sign the bill into law. Meeting the new RPS goals present a considerable challenge, and greater access to renewable energy will be necessary if the State is to meet these new goals.

The Proposed West of Devers Upgrade is ideally situated to connect high-quality sites for wind, solar, and geothermal resources with the Los Angeles load center. The proposed project has the capability to transfer roughly 1000 megawatts of renewable energy more than the environmentally preferred alternative. Over the life of the Upgrade project, the environmental and other benefits of this potential increase in the supply of renewable energy to meet Southern California's demand for electricity will far outweigh the initially greater environmental impacts related to construction of the Proposed Project.

The Final EIR/EIS should recognize the added environmental benefits that will result if an additional 1000 MW is available to transfer renewable energy from the desert areas and Southwestern states to meet California's higher RPS goals. IEP respectfully urges the Commission to consider these additional benefits and to approve the Proposed Project as the route for the West of Devers Upgrade.

B7-1

Comment Set B7 – Independent Energy Producers Association (cont.)

Very truly yours,



Jan Smutny-Jones, Chief Executive Officer
Independent Energy Producers Association

Responses to Comment Set B7 – Independent Energy Producers Association

B7-1 This comment states that the analysis of the Phased Build Alternative may be short-sighted, and that additional environmental benefits may be attributed to the Proposed Project due to its ability to deliver greater amounts of renewable energy. The comment reflects the position that the Proposed Project is needed for the successful development of renewable energy projects. The EIS shows that the Phased Build Alternative would have less capability to transfer energy than the Proposed Project, and the comment asserts that the Proposed Project would therefore add environmental benefits that have not been quantified. As noted in General Response GR-1 the EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity). Further, NEPA requires analysis of a project's impacts as opposed to benefits. See General Response GR-3 for a discussion of achieving California's future renewable energy goals in light of Senate Bill 350 (2015).

The environmental impacts of development of renewable energy projects is discussed in the EIS, based on Section B.7.1, Definition of Connected Action Projects. As such, the EIS recognizes that some generation projects are so closely related to the Proposed Project as to be considered "connected actions," and the EIS also provides information on the environmental impacts of these. The EIS also includes the cumulative projects (Section E) and projects that could fill a remaining growth-inducing capacity. These are categorized in Section A.3, Definition of Connected Actions and Related Projects, and shown in Section F.1.3, Growth Related to Development of Additional Power Generation Facilities.

The comment notes that increasing the renewable energy supply would reduce GHG emissions, and this is consistent with the analysis of Climate Change and GHG emissions in the EIS. Without modeling of changes in generation dispatch inside and outside of California, in scenarios comparing the project and alternatives, it would be speculative to identify any foreseeable changes in emissions from existing or future power plants.

Comment Set B8 – NextEra Energy Resources LLC



September 22, 2015

Via Email

Billie C. Blanchard and Frank McMenimen
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94014
westofdevers@aspenerg.com

Re: SCE West of Devers Upgrade Project (Application A.13-10-20) – NextEra Comments on the Draft EIR/EIS

Dear Ms. Blanchard and Mr. McMenimen:

NextEra Energy Resources, LLC (“NEER”) hereby submits the following comments on the Draft EIR/EIS for the Southern California Edison (“SCE”) West of Devers Upgrade Project (the “Proposed Project”). NEER is a party to the underlying proceeding before the California Public Utilities Commission (“CPUC”) relating to SCE’s underlying Application A.13-10-20, and has specific concerns regarding the scope of the environmental analysis set forth in the Draft EIR/EIS.

Specifically, NEER has ownership interests in four solar generating facilities and three wind generating facilities in the area potentially affected by the Proposed Project. NEER’s indirect subsidiary, Genesis Solar, LLC owns the Genesis Solar Energy Project (“GSEP”), a 250-MW solar thermal generation facility in east Riverside County. GSEP interconnects to the Colorado River Substation and is online. In addition, other NEER indirect subsidiaries own or have an ownership interest in three additional large solar generation facilities in east Riverside County. The 550 MW Desert Sunlight solar photovoltaic project interconnects to the Red Bluff substation and is online. The 250 MW McCoy solar photovoltaic project interconnects to the Colorado River Substation and is online. In addition, the Blythe Solar Power Project is a 485 MW facility under development that will also interconnect at the Colorado River Substation. NEER’s wind energy facilities in the region include the following facilities, all of which are online: FPL Energy Cabazon Wind, LLC, FPL Energy Green Power Wind, LLC, and FPL Energy WPP 93 GP, LLC.

Collectively, these facilities (the “NEER facilities”) all interconnect with transmission facilities that may be impacted during the construction of the Proposed Project due to interruptions in service. Such interruptions in service would directly and materially harm NEER by reducing the generation from NEER’s facilities, resulting in potentially significant economic impacts to NEER.

NextEra Energy Resources, LLC

700 Universe Boulevard, Juno Beach, FL 33408

B8-1

Comment Set B8 – NextEra Energy Resources LLC (cont.)

Furthermore, reductions in the delivery of electrical generation from NEER’s facilities likely will be counterbalanced by increased use of non-renewable energy sources by the California market, resulting in increased emissions and related impacts.

B8-1
cont.

NEER is not opposed to the Proposed Project, but does have significant concerns about these issues as detailed below.

I. Project Objectives

SCE’s Application, and its Proponent’s Environmental Assessment (see, e.g., Section 1.3 of that document), set forth a number of Project Objectives (see p. A-5), including, *inter alia*, the following:

- Project Objective 3: “Meet project need while minimizing environmental impacts.”
- Project Objective 4: “Facilitate progress toward achieving California’s RPS (Renewable Portfolio Standard) goals in a timely and cost-effective manner by SCE and other California utilities.”
- Project Objective 5: “Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.”

These Project Objectives collectively would support the goal of minimizing curtailment of existing renewable power generation during construction of the Proposed Project while seeking to meet RPS goals in a timely manner, both of which NEER strongly supports. However, in the Draft EIR/EIS, the CPUC and BLM identified only three basic Project Objectives, not one of which appears to consider the potential impact of the Proposed Project on operational or soon to be operational generator interconnection projects in the region. While NEER supports the agencies’ interests in upgrading the West of Devers 220 kV transmission lines to provide increased deliverability of electricity, including from planned interconnection projects (see p. A-11), NEER requests that these objectives be modified to expressly state that the Proposed Project is intended to avoid, or minimize as much as possible, possible service interruptions from active or soon to be active generator interconnection projects in the region, including but not limited to NEER-owned facilities.

II. Effects on Utilities and Public Services

On p. D.17-31, Impact UPS-2 is discussed (“Construction would disrupt the existing utility systems or cause a collocation accident”). Specifically, there is mention of the “potential for service interruptions of [] utilities,” but there is scant mention in the Draft EIR/EIS regarding the possible impacts on existing generation facilities. In fact, the Draft EIR/EIS wholly fails to provide any technical data – let alone analysis – of the potential impacts of the Proposed project on existing generation facilities. Moreover, this section identifies one mitigation measure – UPS-2a (“Protect pipeline and overhead and underground utilities”) – but the measure includes no mention of specifically protecting generation from existing facilities, and while “coordination with all pipeline and utility owners” is discussed, there is no mention of coordination with owners and operators of existing generation facilities. Moreover, the measure itself is deficient in that it includes no performance criteria or other benchmarks to evaluate the effectiveness of any “protective measures... to be implemented to protected affected facilities.”

B8-2

Comment Set B8 – NextEra Energy Resources LLC (cont.)

Because of these deficiencies, NEER requests that the CPUC and BLM undertake studies to detail how the Proposed Project might impact generation from existing facilities in the region, that these studies be discussed in the Draft EIR/EIS, and that appropriate mitigation measures be identified, as appropriate, to address all potentially significant impacts.

B8-2
cont.

III. Alternatives

As summarized above, NEER is concerned about the Proposed Project’s construction schedule on the deliverability of generator interconnection projects. As summarized in the Draft EIR/EIS, CEQA requires analysis of alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...” (CEQA Guidelines, Section 15126.6(a).) However, by eliminating any Project Objective focused on avoiding or minimizing interruptions to deliverability from interconnection projects, the discussion of possible alternatives to the Proposed Project fails to discuss in detail alternatives that would avoid or minimize such impacts. Furthermore, it is not clear how the timing of the Proposed Project and of the contemplated alternatives would affect progress towards achieving the State’s renewable policy goals. There is, for example, no comparative discussion of the alternatives relating to contemplated online dates and the construction timelines, duration, and/or the overall transfer capability of the line for renewable interconnection.

B8-3

Consistent with the comments above, we request that the discussion of Alternatives be re-evaluated in the context of a new or revised Project Objective expressly focusing on avoiding or minimizing interruptions to or curtailment of interconnection projects.

Finally, as a general housekeeping measure, please add the following name to the notification list for the Proposed Project in addition to the currently-listed contacts for NEER:

Scott Castro
Senior Attorney
NextEra Energy Resources, LLC
1 Post Street
San Francisco, California 94104
Scott.Castro@NextEraEnergy.com

Thank you for the opportunity to comment on the Draft EIR/EIS. We are hopeful that NEER’s concerns will be addressed in additional CEQA and NEPA analyses for the Proposed Project.

Sincerely yours,



Scott N. Castro
NEXTERA ENERGY
RESOURCES, LLC

NextEra Energy Resources, LLC
700 Universe Boulevard, Juno Beach, FL 33408

Responses to Comment Set B8 – NextEra Energy Resources LLC

B8-1 The comment is concerned that only three agency-defined Basic Project Objectives appear in the Draft EIR/EIS, and suggests that the objectives should be modified to include an objective that the project is intended to avoid or minimize possible service interruptions during West of Devers construction for operational or soon to be operational generators.

The EIS provides background information on the Proposed Project, as it would be SCE's proposed solution to achieving its Project Objectives (Section A.2.1.3, Review of SCE's Purpose and Need), and the EIS also reviews some of the solutions that presently ensure safe and reliable electric transmission service within the West of Devers corridor (Section C.6.2.1, Current Transmission Plans).

The rationale for selecting each of the CPUC and BLM Basic Project Objectives is presented in EIS Section A.2.3, and General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives as they relate to SCE's objectives.

Any service interruptions required during construction would be coordinated with and authorized by CAISO, which operates the grid. All activities related to transmission construction and operation, and the operation of existing generation facilities in the region, are required to comply with existing regulatory standards and oversight framework, including those applicable to planned service interruptions. This ensures safe and reliable service that is cost-effective, while minimizing environmental impacts. Existing generators are expected to operate in compliance with this framework. These generators would be physically unchanged by the project and no environmental impacts related to service interruptions from generators interconnected to the transmission system are identified. The concerns expressed in the comment appear to be economic rather than an environmental in nature.

B8-2 The comment requests a discussion regarding the effects of the Proposed Project on existing generation facilities in the region, and the comment suggests that owners and operators of power plants should be included in Mitigation Measure UPS-2a (Protect pipeline and overhead and underground utilities).

The EIS focuses on identifying the foreseeable and potentially significant environmental effects that are physical impacts, including unplanned disruptions of service systems for gas, electricity and water and collection systems such as for stormwater and wastewater. Because the project would physically cross a large number of electrical or utility systems and could result in collocation accidents that themselves would have environmental impacts, Mitigation Measure UPS-2a (Protect pipeline and overhead and underground utilities) addressing this possibility was included in the EIS.

The Proposed Project is not anticipated to have direct or indirect environmental effects that are physical impacts on existing generation facilities in the region. The existing generators would be unchanged by the project. While planned and unplanned outages along the existing or nearby transmission lines could potentially result in temporary curtailment of the existing generators, for the reasons discussed below it is not practical to identify or analyze potential environmental effects of such outages now because doing so would require pure speculation as to when/where such outages would take place and where replacement electricity would originate. While other generators would be available to ensure that safe and reliable delivery of electricity continues uninterrupted, it is impractical now to identify

where that generation would come from and what source of power would be utilized. For example, the EIS shows that the No Project Alternative could “increase the reliance on non-renewable energy and increase the dispatch and use of more-costly or less-efficient power plants within the Los Angeles Basin” until an alternative project could be developed (Section C.6.3.1, No Project Alternative Option 1). However, as noted in Section B.3.10 (Description of the Proposed Project, Construction Schedule and Sequence) any short- or long-term transmission line outages to facilitate construction would typically be scheduled through and subject to the approval of the CAISO. Electricity dispatch would be coordinated as usual given the available capacity of the remainder of the transmission system. It is not possible at this time to know any detail regarding specific outages or temporary curtailment for a given generator, and it would not be necessary to implement mitigation for the owners and operators of these facilities.

- B8-3 The comment is concerned that greater detail should be provided regarding the potential interruptions experienced by generators as a result of the construction schedule for the project and alternatives. The comment requests revising the objectives to expressly focus on minimizing interruptions to or curtailment of generators. The EIS shows that SCE’s final engineering and procurement activities, acquisition of any necessary property rights, and receipt of other applicable permits will influence the construction schedule for the project, as well as the alternatives (Section B.3.10, Construction Schedule and Sequence). The EIS also generally compares the construction schedules for the project and alternatives in the context of the anticipated environmental effects in Section G.4, Comparison of Alternatives. See Response to Comment B8-1 on the topic of revising the objectives to reduce possible service interruptions from generators.

Comment Set B9 – California Independent System Operator Corporation



California Independent System Operator Corporation

September 22, 2015

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
westofdevers@aspene.com

RE: CAISO Comments on the West of Devers Upgrade Project Draft Environmental Impact Report

Dear Ms. Blanchard;

I. Introduction

The California Independent System Operator Corporation (CAISO) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared for the West of Devers Upgrade Project (Proposed Project) by the California Public Utilities Commission (CPUC). The CAISO is very concerned that the DEIR's Phased Build Alternative has not been adequately tested, may not meet the identified, immediate need for the Proposed Project, and will inappropriately restrict future development of renewable generation necessary to effectively and efficiently meet California's clean energy goals. The CAISO is specifically concerned that the DEIR does not use the renewable portfolios developed by the CPUC and used in the CAISO's transmission planning process to analyze the need for the Proposed Project. Further, the DEIR does not adequately explore issues, including potentially adverse environmental impacts, associated with further expansion of the Phased Build Alternative.

In accordance with its generator interconnection process tariff provisions, the CAISO initially identified the Proposed Project as necessary to connect certain renewable generation projects in the CAISO's interconnection queue to the CAISO grid. Subsequently, the CAISO confirmed the need for the Proposed Project in its Transmission Planning Process studies of public policy driven projects. The CAISO's public policy driven studies seek to identify transmission necessary to interconnect expected future renewable generation projects to meet State clean energy goals based on CPUC-developed renewable portfolios.

The CAISO's comments on the DEIR focus on two concerns with the selection of the Phased Build Alternative as the environmentally superior alternative: (1) whether the DEIR properly defines project objectives and selects alternatives that meet those objectives; and (2) critical flaws in the technical analysis of alternatives to the Proposed Project. The CAISO has no comments regarding the Tower Relocation Alternative or the Iowa Street 66 kV Underground Alternative.

B9-1

Comment Set B9 – California Independent System Operator Corporation (cont.)

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II. Discussion

A. The DEIR Improperly Defines and Assesses Basic Project Objectives.

The DEIR defines the “Basic Project Objectives” for the Proposed Project as follows: (1) “to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW,” (2) “to support achievement of State and federal renewable energy goals” and (3) “to maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded.”¹ However, the DEIR’s analysis of Basic Project Objective 2 does not align with the CAISO’s and the CPUC’s processes for identifying and approving public policy driven transmission projects. Instead, the DEIR focuses on interconnection queue information in isolation and does not reflect or take into account the renewable energy portfolios developed by the CPUC or the environmental and resource potential assessments already considered by the CPUC RPS analysis. Because the increased system deliverability discussed in Basic Project Objective 1 is directly related to achieving renewable energy goals, the flawed analysis with respect to Basic Objective 2 results in an inaccurate system deliverability number.

1. The DEIR’s analysis of Basic Project Objective 2 does not reflect the Renewable Portfolio Standard (RPS) goals and portfolios developed by the CPUC.

As stated above, the CAISO initially identified the need for the Proposed Project as part of the generator interconnection process and subsequently affirmed the project’s need based on studies of public policy driven projects in the transmission planning process. Importantly, the CAISO bases its transmission planning process policy studies on the RPS portfolios developed by the CPUC. Thus, the CAISO determined that the Proposed Project was needed based on RPS portfolios developed by the CPUC and provided to the CAISO for use in the CAISO’s transmission planning process. As stated in the CAISO’s 2014-2015 transmission plan:

...The CPUC plays a primary role formulating the resource portfolios as the agency that oversees the supply procurement activities of the investor-owned utilities and retail direct access providers, which collectively account for 95 percent of the energy consumed annually within the [CAISO] area. The proposed portfolios are reviewed with stakeholders to seek their comments, which are then considered for incorporation into the final portfolios.

The resource portfolios have played a crucial role in identifying public policy-driven transmission elements. Meeting the RPS has entailed developing substantial amounts of new renewable generating capacity, which will in turn required new transmission for delivery. The uncertainty as to where the generation capacity will locate has been managed recognizing this uncertainty and balancing the requirement to have needed transmission completed and in service in time to support the RPS against the risk of building transmission in areas that do not realize enough new

¹ SCE West of Devers Upgrade Project, Executive Summary, pp. ES-6-ES-7.

Comment Set B9 – California Independent System Operator Corporation (cont.)

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generation to justify the cost of such infrastructure. This entailed applying a “least regrets” principle, which first formulates several alternative resource development portfolios or scenarios, then identifies the needed transmission to support each portfolio followed by selecting for approval those transmission elements that have a high likelihood of being needed and well-utilized under multiple scenarios.²

**B9-2
cont.**

The DEIR gauges attainment of Basic Project Objective 2 by seeking to ensure that the various alternatives can achieve some level of additional renewable generation development; however, the DEIR fails to reference the volumes of renewable energy reflected in the CPUC-developed renewable generation portfolios. The CPUC’s renewable generation portfolios serve as the basis for the CAISO’s deliverability analyses and, as a result, are critical in defining project objectives and driving the need for policy driven projects. In defining the Basic Project Objectives, the DEIR fails to acknowledge the central role of CPUC-developed renewable generation portfolios in the transmission planning process. As such, the DEIR’s analysis and conclusions are inconsistent with the CPUC’s own RPS studies and portfolios that are intended to drive both renewable procurement by load serving entities and the identification of needed transmission upgrades to ensure achievement of the State’s RPS goals.

The CPUC and the CAISO have acknowledged the importance of agency coordination in developing and studying the renewable energy portfolios to identify policy driven transmission projects. This was most recently reiterated in the March 11, 2015 letter from CPUC President Picker (CPUC) and California Energy Commission Chairman Weisenmiller (CEC) to Steve Berberich, CAISO President and Chief Executive Officer, regarding Base Case Renewable Resource Portfolio and an Alternative Renewable Resource Portfolio for the CAISO 2015-2016 Transmission Planning Process.³ In this letter, the CPUC and CEC recommended specific renewable energy portfolios for the CAISO to study in its 2015-2016 transmission plan. This letter also refers to the May 2010 Memorandum of Understanding (MOU) between the CAISO, the CPUC and the CEC which called for increased transmission planning coordination, especially with regard to policy driven projects. Specifically, the MOU notes that CAISO will present “a formal assessment of the transmission planning needs within the [CAISO] balancing authority area for the CPUC-provided renewable resource scenarios.”⁴ This reinforces that the CPUC-developed renewable energy portfolios drive project objectives and need.

Although the CAISO understands that the CPUC-developed portfolios are not the only information relevant to achieving renewable energy goals, any additional information should complement and support the development of plans capable of meeting the portfolios. Such information should not undermine achievement of the CPUC’s portfolios. The DEIR’s focus is narrow in this regard because it merely cites to the CAISO’s interconnection queue and notes that the alternative projects meet current

² CAISO 2014-2015 Board of Governor Approved Transmission Plan, March 27, 2015, pp. 20-21.

³ http://www.cpuc.ca.gov/NR/rdonlyres/C8D2FA01-E466-45C1-984B-663C7B827182/0/2015_16TPP_Portfoliotransmittal_ltr.pdf.

⁴ Attachment A, Memorandum of Understanding between the CPUC and CAISO Regarding the Revised CAISO Transmission Planning Process, p. 2.

Comment Set B9 – California Independent System Operator Corporation (cont.)

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interconnection queue needs.⁵ The DEIR ignores that the Proposed Project is also designed to meet much broader public policy goals, in particular, providing accesses to other generation reflected in the CPUC’s RPS portfolios. Reviewing the interconnection queue information may be helpful as a directional indicator; however, that narrow review should not—and cannot—form the basis for an analysis of whether the proposed alternatives meet the State’s renewable energy goals. The CPUC has separately identified the targeted RPS portfolios for achieving the state’s energy goals.

In its only substantive reference to the CPUC-developed portfolios, the DEIR notes that discussions with CPUC RPS staff led to the conclusion that renewable resource shortfalls resulting from an alternative with less capacity than the Proposed Project could be accommodated by increased renewable development in other locations.⁶ However, this conclusion erroneously assumes that the only consideration for siting renewable projects in the CPUC-developed portfolios is the sufficiency of transmission. The conclusion does not take into account all other factors considered in determining the renewable resources selected in the RPS portfolios, such as resource potential, cost and environmental issues. It does not appear that the CPUC RPS staff was consulted as to whether it would be appropriate or desirable to reassign assumed renewable energy development based solely on transmission considerations.⁷ A DEIR is not the appropriate forum to effectuate a change in the CPUC’s RPS portfolios, and it undermines the processes that have been established to identify RPS portfolios and identify transmission needed to meet the State’s RPS goals.

The CAISO recognizes that time has passed since SCE submitted the initial application for the Proposed Project. As a result, the DEIR needed to take into account updated information. However, the CAISO believes that the updated information should have been based on the CPUC-developed renewable energy portfolios provided in the 2014-2015 planning cycle and the resulting conclusions developed in the 2014-2015 transmission plan.

The CAISO will develop testimony in this proceeding relying on the most up-to-date available information, which is currently the CPUC-developed RPS portfolios provided to the CAISO for use in the 2015-2016 transmission planning cycle.⁸

B9-2
cont.

⁵ DEIR Appendix 5, Project Alternatives Assessment, pp. 10-12.

⁶ DEIR Appendix 5, p. Ap-5-53.

⁷ DEIR Appendix 5, p. AP-5-53. (“The EIR/EIS preparers asked CPUC RPS Staff to test the “RPS Calculator” to show how future renewable resource portfolios might change with a smaller upgrade to WOD than SCE has proposed. With RPS Calculator V.5: there would be no additional transmission capacity needed elsewhere in the state to make up for generation decreased in Riverside East; and renewable generation in Westlands or other zones (including San Diego South and Solano) would replace the generation decreased in Riverside East, using existing transmission capacity available in the other zones. With RPS Calculator V.6.1: there would be no impact on the generation selected in Riverside East or elsewhere.”)

⁸ http://www.cpuc.ca.gov/NR/rdonlyres/C8D2FA01-E466-45C1-984B-663C7B827182/0/2015_16TPP_Portfoliotransmittal_ltr.pdf.

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2. The DEIR and Basic Project Objectives 1 and 2 do not meaningfully consider potentially higher renewable energy goals.

B9-3

Although Basic Project Objective 2 identifies the need “to support achievement of State and federal renewable energy goals,” the DEIR analysis did not materially consider potential renewable energy goals in excess of the current 33% by 2030 legislative requirement. Instead, Basic Project Objective 1 narrowly defines the goal of increasing deliverability by “at least 2,200 MW.” This limited goal is not informed by potentially higher renewable energy goals that have recently been considered by the legislature, the Governor and the CPUC itself. Because the Basic Project Objective 1 is narrowly drafted, the DEIR’s preferred alternative, the Phased Build Alternative, is not tailored to meet higher renewable energy goals.

During the preparation of the DEIR, the Governor and the state legislature were actively engaged in efforts to increase the State’s renewable energy goals. In addition, in the context of the long-term procurement plan proceeding, the CPUC has studied scenarios with renewable energy goals in excess of 33%.⁹ The DEIR analysis does not account for potentially higher renewable energy goals, and the DEIR was issued prior to the legislature’s passage of Senate Bill 350 directing investor owned utilities to achieve to a 50% RPS by 2030.¹⁰

The DEIR notes that additional capacity can be added to the Phased Build Alternative in the future if additional upgrades are needed.¹¹ The DEIR states that this may be accomplished by either constructing a new circuit in the existing transmission corridor or by reconductoring the Phased Build Alternative at a later date. Although the DEIR acknowledges the potential impacts of those later steps, it does not explore them in sufficient detail to support the Phased Build Alternative. Specifically, the CAISO believes that the following factors must be analyzed in greater detail prior to determining whether the Phased Build Alternative is preferred over the Proposed Project:

- a. The cost and environmental impacts of salvaging the upgraded towers and building additional transmission lines in the future, as well as reconductoring the newly constructed double circuit line under the Phased Build Alternative;
- b. The challenges in obtaining outages that will be necessary to allow the construction of the Phased Build Alternative, which will become more difficult in the future as increased amounts of renewable generation come on line, as well as the potentially higher lost generation production under the Phased Build Alternative.
- c. Higher resistive losses incurred under the Phased Build Alternative, contributing to higher energy costs and greenhouse gas emissions. The CAISO expects that use of Drake

B9-4

⁹ Assigned Commissioner’s Ruling on Updates to the Planning Assumptions and Scenarios for Use in the 2014-2015 Long-Term Procurement Plan and the California Independent System Operator’s 2015-2016 Transmission Planning Process, March 4, 2015, p. 42.

¹⁰ https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350.

¹¹ DEIR Executive Summary, p. ES-16.

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1-795 ACCR will have approximately four times the resistive losses of 2B-1590 ACSR. There appears to be no quantification of the expected cost implications or consideration of the environmental impact of such significant additional line losses.¹² The increased losses are an environmental and policy issue, especially given the state’s emphasis on energy efficiency and reduced greenhouse gas emissions.

B9-4
cont.

B. The DEIR’s Alternative Analysis Requires Technical Clarification.

1. The alternative analysis relies on an incorrect calculation of deliverability need for generators in the CAISO’s interconnection queue.

B9-5

As stated in Section II.A of these comments, the CAISO believes that the project objectives should be defined and assessed based on the CPUC-developed renewable energy portfolios and the CAISO’s policy driven transmission planning studies based on those portfolios. However, the alternative analysis conducted in the DEIR aims to increase system deliverability by “at least 2,200 MW” based solely on projects identified in the CAISO’s interconnection queue. In addition to disagreeing with this unduly limited approach to defining project objectives, the CAISO has reviewed the analysis and has identified certain technical clarifications that should be addressed in the DEIR.

The DEIR’s 2,200 MW deliverability target is based solely on an analysis of projects in the CAISO’s interconnection queue. The DEIR notes that “the [transmission cluster] Phase 2 study indicated a need to provide deliverability for ~2200 MW of new queued generation projects; and whereas the CAISO response to the first set of Data Requests indicates a level of 1881 MW (nearly five years later).”¹³ These statements do not provide a complete picture of current interconnection needs and cannot serve as the basis for establishing the appropriate deliverability limit.

In particular, this analysis fails to acknowledge that the 1,881 MW of generation in the CAISO interconnection queue is incremental to the 985 MW of generation currently receiving Full Capacity Deliverability Status through the West of Devers interim upgrade. The West of Devers interim upgrade is not an acceptable or approved long term solution to provide deliverability because it is not capable of operating with the capacity additions in the Proposed Project. Instead, the interim upgrade will be removed and replaced by the Proposed Project. Accordingly, based on the information that was available during preparation of the DEIR, the project selected in this proceeding would need to support deliverability for at least an additional 2,866 MW (1,881 MW of queued generation plus 985 MW of existing and queued generation) to accommodate all projects requesting interconnection through Cluster 7 of the CAISO’s generator interconnection process.

¹² See DEIR, Appendix 5 p. AP-5-55. (“Line losses: ACCR material has higher electrical losses. These losses would result in economic consequences, but these would have to be compared to the reduced construction cost achieved from the reuse of the existing 220 kV towers.”)

¹³ DEIR Appendix 5, Project Alternatives Assessment, p. 6.

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The CAISO stresses, however, that this information is out dated because currently 3,631 MW of incremental generation is seeking interconnection and Full Capacity Deliverability Status in Cluster 8 of the CAISO’s interconnection process. The CAISO does not imply that system reinforcements should be sized to accommodate all generation in the interconnection queue, but rather the constant (and significant) state of change in the interconnection queue further reinforces the need for holistic, more-forward looking planning based on the policy-driven portfolios developed by the CPUC.

B9-5
cont.

2. The DEIR reflects a misunderstanding and misinterpretation of the CAISO reliability-driven and policy-driven analyses.

B9-6

The DEIR inappropriately uses the CAISO’s 2024 Reliability base case to establish deliverability provided by alternatives to the proposed project.

The DEIR specifically notes as follows:

The CAISO’s 2024 Reliability base case, from the CAISO’s 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO’s and SCE’s perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. The generation level within the Eastern Bulk system for the region under analysis (refer to Table A4 in Appendix A) is:

- Total Generation On-line: 3754 MW
- Total Generation Capacity: 6901 MW¹⁴

The DEIR incorrectly states that these quantities reflect the view of the CAISO and Southern California Edison Company (SCE) regarding the level of generation deemed viable and that will be in place and operational in 2024. The generation portrayed in the 2024 Reliability case simply reflects a share of the CPUC-developed portfolio amounts that was allocated to the ISO-controlled grid, with other shares allocated to the Imperial Irrigation District (IID) through the location of resources making up the portfolio amounts. Furthermore, the CAISO adjusts dispatch as necessary in the reliability base case to adequately test the reliability of the system.

In contrast, the CAISO 2013-2014 policy-driven analysis relied upon the “commercial interest (base)” portfolio provided by the CPUC. The 2014-2015 transmission plan used this same base case portfolio, noting that this “portfolio was identified as the appropriate base case for the ISO to study in its 2014-2015 transmission planning process because it represents the most likely path of renewable development in the future.”¹⁵ Unlike the reliability base case, the policy-driven analysis seeks to ensure deliverability for the renewable energy portfolio and does not adjust dispatch to test reliability.

¹⁴ DEIR Appendix 5, Project Alternatives Assessment, p. 5.

¹⁵ CAISO 2014-2015 Transmission Plan, p. 177.

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3. The DEIR analysis relies on import level from IID that is inconsistent with the renewable generation portfolios and current CPUC direction.

B9-7

The DEIR analysis relies on incorrect assumption that 1,400 MW imports will be realized from IID.¹⁶ The CAISO recognizes that at the time SCE developed its application, procurement for achieving the 33% RPS objective was not completed, and the CPUC had provided direction to investor owned utilities to conduct procurement assuming that up to 1,400 MW of renewable generation could be deliverable from within IID.¹⁷ However, the CPUC subsequently revised that directive and clarified that the investor owned utilities should no longer assume a maximum import capability of 1,400 MW from IID.¹⁸

This change in circumstance further supports the need to rely on the CPUC-developed renewable portfolios developed specifically for long term transmission planning purposes.

4. The DEIR methodology for assessing the impacts of the Phased Build Alternative on generation development appears to be based on a comparative benchmarking rather than an explicit study of deliverability.

B9-8

The CAISO's deliverability methodology is publicly available, extensively documented, and fully vetted through the transmission planning process. Rather than performing a comparative analysis of the project alternatives, the CAISO suggests that its deliverability analysis be used to determine whether the preferred alternatives provide the necessary deliverability. The CAISO intends to conduct this deliverability analysis and present its results in prepared direct testimony in A.13-10-020.

5. The DEIR incorrectly implies that the Phased Build Alternative satisfies Project Alternatives Assessment Case #4.

B9-9

In the Project Alternatives Assessment,¹⁹ the DEIR studies the capabilities of the Proposed Project and Phased Build Alternative to meet selected study cases. Case #4 specifically studies the CAISO Cluster 7 Phase 1 generation levels. The analysis states that:

the purpose of evaluating this case and associated sensitivities was to establish and determine an upper end of the loading spectrum. If the proposed 795 Drake ACCR conductors can withstand the extra loading imposed by the higher penetration of

¹⁶ DEIR Appendix 5, p. AP-5-48. ("Based on power flow modeling completed for this alternative (see results in Table A3 in Attachment 2 to this appendix), this alternative satisfies the CAISO's 2024 Reliability Base Case, which includes specific generation projects that the CAISO has determined to be most likely to be constructed plus a scenario of 1,400 MW from IID to the CAISO.")

¹⁷ CPUC Decision (D.) 12-11-016.

¹⁸ D.14-11-042, p. 116. ("It is reasonable to remove the Commission's requirement to assume a maximum import capability of 1,400 MW from IID Balancing Authority Area as directed in June 7, 2011 ACR and D.12-11-016.")

¹⁹ DEIR Appendix 5, Project Alternatives Assessment.

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generation modeled in this base case, then the other less stressed scenarios will pass the test.²⁰

B9-9
cont.

The Project Alternative Assessment concludes that the Proposed Project satisfies Case #4. However, there is no indication whether the Phased Build Alternative satisfies Case #4. Specifically, the narrative indicates that the **Proposed Project** has “no overloading of facilities and the worst loading is on the Devers–Vista circuit at 56% and 68% under single and double contingencies respectively.” Because the Phased Build Project conductor has an emergency ampacity equal to only 47% of Proposed Project, the observed 56% and 68% loading would exceed the capability of the proposed conductor for the Phased Build Alternative. Based on this narrative, it appears the Phased Build Alternative would not satisfy Project Alternative Assessment Case #4.

6. The DEIR does not provide sufficient detail regarding specific impacts of the Phased Build Alternative.

B9-10

The Phased Build Alternative consists of (1) replacing two single circuit towers with a new double circuit tower capable of supporting 2-1590 ACSR conductors but strung with 1-795 ACCR conductor, and (2) strengthening and/or raising a portion of the existing double circuit tower and re-stringing it with 1-795 ACCR. The level of detail provided in the DEIR is not sufficient for the CAISO to develop a specific recommendation regarding the Phased Build Alternative at this time, other than to identify certain concerns and the need for additional information. In any event, the CAISO believes the following concerns related to the Phased Build Alternative should be addressed in the Final Environmental Impact Report:

- a. Using a smaller single conductor is not identified as having any materially different environmental impact during construction, but the need to re-string in the future will have an additional environmental impact in an area presumably recovering from the initial construction disturbance. This additional impact should be included in the analysis of the Phased Build Alternative.
- b. Accommodating future outages to a double circuit line (after additional renewable generation has connected to the grid and is dependent on the circuits) may be more challenging and will could result in increased curtailment of renewable generation during the construction period, causing negative environmental and market impacts, especially if both circuits need to be de-energized during construction. The CAISO notes that it is not likely that one circuit can be re-strung with an energized line on the adjacent tower position.
- c. Using the smaller conductor on the new construction increases transmission line losses on those circuits approximately by a factor of four, which raises both

B9-11

²⁰ DEIR Appendix 5, Project Alternatives Assessment, p. 10-11.

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environmental and policy issues given the State’s energy efficiency objectives. In addition it is inefficient and ultimately increases costs.

The CAISO has not yet conducted a complete review of these issues, and makes no specific recommendation at this time. However, the apparent inconsistencies identified above should be addressed in the Final Environmental Impact Report.

III. Conclusion

The CAISO appreciates the opportunity to provide these comments on the DEIR and looks forward to presenting more detailed analysis in the context of A.13-12-020.

Respectfully,

/s/ Delphine Hou
Delphine Hou
External Affairs Manager

**B9-11
cont.**

B9-12

Comment Set B9 – California Independent System Operator Corporation (cont.)

ATTACHMENT A

Comment Set B9 – California Independent System Operator Corporation (cont.)

**Memorandum of Understanding
Between
The California Public Utilities Commission (CPUC)
And
The California Independent System Operator (ISO)
Regarding
The Revised ISO Transmission Planning Process**

B9-13

The ISO has proposed revisions to its transmission planning process to enable the ISO to identify the transmission infrastructure needed to achieve certain state policy targets including, but not limited to, 33 percent renewable generation procurement by load serving entities by 2020.

The CPUC develops renewable generation portfolio scenarios as part of its Long Term Procurement Plan process that will assist the ISO in identifying transmission projects needed under various renewable generation location assumptions and developing a comprehensive transmission plan.

The CPUC and the ISO desire to work together to coordinate the ISO's revised transmission planning process and identification of needed transmission infrastructure with the CPUC's subsequent siting/permitting processes.

The revised ISO transmission planning process will provide opportunities for the ISO and the CPUC to coordinate the ISO's scenarios analysis and development of the ISO's comprehensive transmission plan with the CPUC's siting/permitting processes.

Accordingly, the CPUC and the ISO agree to the following:

1. The California Transmission Planning Group process, which is a major part of Phase 1 of the ISO transmission planning process, will develop an annual statewide conceptual transmission plan that will become the starting point for further review and analysis in Phase 2 of the ISO transmission planning process. The ISO and the CPUC will participate in the California Transmission Planning Group process to incorporate, to the extent practical, alternative planning scenarios that will enable that effort to identify an initial set of needed "least regrets" transmission facilities for consideration in TPP Phase 2.
2. In Phase 2 of the 2010-2011 cycle of the ISO transmission planning process, the ISO will consider and incorporate into its plan scenarios from the CPUC Long Term Procurement Plan process, to the maximum extent practical given the goal of identifying needed renewable access elements of the Phase 2 plan by December 2010. The CPUC will provide notice that Phase 2 of ISO transmission planning process will consider and incorporate these scenarios, and the subsequent CPUC siting/permitting process will then give substantial weight to project applications that are consistent with the ISO's final Phase 2 plan.
3. The CPUC and the ISO will review the results of the California Transmission Planning Group modeling phases and evaluate their implications for the transmission needs of the CPUC's Long Term Procurement Plan renewable resource scenarios. The ISO will subsequently seek, within the time and human resource constraints of Phase 2 of the

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- transmission planning process, to provide the CPUC and other stakeholders with a formal assessment of the transmission planning needs within the ISO balancing authority area for the Long Term Procurement Plan renewable resource scenarios.
4. CPUC and ISO will determine a process for subsequent cycles of the ISO transmission planning process, by which the ISO will formally assess scenarios provided by the CPUC. Provided the CPUC meets parameters agreed to by both parties with regards to the number, timing, and format of the scenarios, the ISO will provide CPUC and other stakeholders with a formal assessment of the transmission planning needs within the ISO balancing authority area for the CPUC-provided renewable resource scenarios.
 5. For Phase 2 of the transmission planning process, the ISO will conduct a stakeholder process that complies with Order 890 of the Federal Energy Regulatory Commission (FERC) and allows meaningful public participation to ensure that appropriate study assumptions and scenarios are identified to support development of the final Phase 2 plan. Stakeholders will have opportunities to comment on published drafts of the Phase 2 plan, as well as on the final Phase 2 plan that will be submitted for approval to the ISO Board of Governors. The final Phase 2 plan for the ISO balancing authority area will reflect the ISO's consideration of all stakeholder comments and recommendations received during the planning process.
 6. The final Phase 2 plan will identify specific needed transmission facilities, and will distinguish between Category 1 facilities which merit unconditional approval based on the concept of "least regrets," versus Category 2 facilities which may be needed depending on the course of future generation development.
 7. The facility specifications in the final Phase 2 plan will provide sufficient detail to enable eligible parties to develop and submit, in Phase 3, proposals to build the Category 1 facilities, including construction schedules and detailed cost estimates. During the next annual cycle of the California Transmission Planning Group and ISO transmission planning processes, parties may suggest alternatives to the Category 2 facilities, and the ISO will re-evaluate these facilities and consider any submitted alternatives in developing the next annual transmission plan.
 8. ISO participating transmission owners and other parties will have opportunities to build elements of the final Phase 2 plan that are not covered under transmission categories assigned to participating transmission owners to build under the ISO tariff. Parties may propose to build specific Category 1 facilities identified in the Phase 2 plan, or, for Category 2 facilities, may propose alternative elements to meet the same functional needs.
 9. Proposals to build specific Category 1 transmission facilities that are identified in the final Phase 2 plan would proceed directly to the CPUC and/or other siting authorities for Certificate of Public Convenience and Necessity, California Environmental Quality Act and other siting/permitting requirements.
 10. In cases where two or more proposals are submitted and found by the ISO to be technically acceptable for constructing the same Category 1 facility, the CPUC will choose, as needed, between two or more CPUC-jurisdictional proposals. In cases where two or more duplicative project proposals are all being considered by the same siting authority, the ISO will defer to the siting authority to choose between the projects. In cases where two or more duplicative project proposals are being considered by different siting authorities, the ISO will choose among the proposals based on objective criteria to be established.
 11. The CPUC and ISO recognize that this Memorandum of Understanding is being

B9-13
cont.

Comment Set B9 – California Independent System Operator Corporation (cont.)

completed based on the ISO's revised transmission planning process proposal, which will be submitted to FERC in the near future, and which the subsequent FERC order could modify. If any FERC-ordered modifications substantively affect the terms of this Memorandum of Understanding, the CPUC and ISO will collaborate to develop appropriate revisions to the Memorandum of Understanding.

B9-13
cont.

The CPUC and the ISO understand and agree to the terms of this Memorandum.

California Public Utilities Commission

By: Michael A. Peevey
Name: Michael Peevey
Title: Commission President

Date: 5-13-10

By: Paul Claron
Name: Paul Claron
Title: Executive Director

Date: 5-13-10

California Independent System Operator Corporation

By: Y. Mansour
Name: Yakout Mansour
Title: President and CEO

Date: 5-13-10

Responses to Comment Set B9 – California Independent System Operator Corporation

B9-1 The comment reflects concerns that the Phased Build Alternative may require more analysis, may not meet the previously identified need for the project, and may restrict future development of renewable generation. The comment also introduces concerns on the topic of the renewable resource portfolios that are used in the CAISO Transmission Planning Process, as transmitted to CAISO from the CPUC, and how those portfolios should be used in the development of project-level alternatives. The comment also provides an introduction of concerns that CAISO has regarding environmental impacts and potential future phases associated with the Phased Build Alternative, which are addressed in more detail in Comment B9-10.

As noted by the comment, and as discussed EIS Section A, the Proposed Project was originally identified by CAISO to accommodate certain renewable energy generation projects and for fulfilling specific Large Generator Interconnection Agreements (LGIAs). According to the comment, CAISO subsequently “confirmed” the need for the Proposed Project through the study of public policy-driven renewable energy projects that were based on the CPUC-developed portfolios. To capture this history, the EIS Basic Project Objective 1 recognizes that initial identification for the Proposed Project came in 2010 as a result of 2,200 MW of interconnection requests from five renewable energy generation projects (EIS Section A.2.1.4, Interconnecting Planned Generation Resources).

General Response GR-1 (Project Need) addresses how each individual transmission element that is the subject of an application for a CPCN must be independently evaluated within the CPUC general proceeding. As such, the EIS does not determine or define any level of need for the Proposed Project or any alternative. Note also that General Response GR-2 (Agency-defined Basic Project Objectives) provides a discussion of the agency-specific Basic Project Objectives.

General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) provides further information on the topic of how RPS portfolios from the transmission planning process may be considered in the assessment of project-level need.

B9-2 The comment asserts that Basic Project Objective 2 does not reflect RPS goals or the portfolios that are used in the CAISO Transmission Planning Process. The comment includes a copy of the May 2010 MOU between CAISO and CPUC on the Revised ISO Transmission Planning Process (Comment B9-13). General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives and background on how the Basic Project Objectives are used in the proper NEPA consideration of alternatives.

This comment describes the need for the Proposed Project as being “affirmed” during studies of public policy-driven renewable energy projects in the CAISO Transmission Planning Process that occurred after the initial identification of the Proposed Project for fulfilling certain LGIA’s. The comment points to the CAISO’s 2014-2015 Transmission Plan in stating that “the CAISO determined that the Proposed Project was needed based on RPS portfolios.” In light of CAISO’s opinion on project need, note that the EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity) as none was provided as a specific project objective.

Contrary to the assertion of the comment, the EIS does not attempt to “effectuate a change” in the RPS portfolios. The EIS provides information on project alternatives under the premise that transmission planning process does not limit the consideration of project-level alternatives. General Response GR-3 provides more information on this topic. As described in General Response GR-1 (Project Need), each individual transmission element that is the subject of an application for a CPCN must be independently evaluated, and General Response GR-2 (Agency-defined Basic Project Objectives) shows that the scope of alternatives in the environmental review must not be unduly limited.

See General Response GR-3 for more information on how the EIS determines consistency with Basic Project Objective 2, and the overview in GR-3 of the project-level environmental review process as it relates to the Revised CAISO Transmission Planning Process of the May 2010 MOU. The Proposed Project predates the Revised CAISO Transmission Planning Process that was established with the May 2010 MOU. This means that CAISO’s initial studies of “public policy driven” renewable resource portfolios occurred after the initial identification of the Proposed Project for interconnecting 2,200 MW of generation. Because of this timing, the 2010-2011 and subsequent transmission plans incorporate the Proposed Project as a “base case” transmission addition for specific generation projects rather than being formally categorized as “policy-driven” for the renewable portfolios. Technical details on how updated portfolios are reflected within the power flow analysis appear in Response to Comment B9-6.

The comment indicates that CAISO intends to present testimony in the CPUC general proceeding (A.13-10-020) regarding the transmission needed for the renewable portfolios, and how the portfolios relate to the interconnection queue. General Response GR-1 notes that the overall level of project need will be addressed within the general proceeding.

B9-3 The comment asserts that Basic Project Objective 2 should consider potentially higher renewable energy goals, and that Basic Project Objective 1 is too narrow. The EIS recognizes that a key objective of the Proposed Project is to increase the power transfer capability of the corridor’s transmission facilities (EIS Section A.2.1.4, Interconnecting Planned Generation Resources). However, as discussed in General Response GR-2, the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals. Accordingly, Basic Project Objective 1 specifies a minimum level of deliverability for the EIS scope of alternatives.

General Response GR-3 provides further information on how consistency with Basic Project Objective 2 was assessed in the development of alternatives. The EIR does not evaluate whether any alternative is needed or whether it should accommodate some prescribed level of development beyond those set forth in the Basic Project Objectives.

The comment asserts that the Phased Build Alternative is not tailored to meet renewable energy goals in excess of the 33 % RPS. The comment recognizes that the Draft EIR/EIS analysis was prepared and released before passage of a higher 50 % RPS in Senate Bill 350 (2015). The comment continues by identifying potential future activities that would create environmental impacts, based on the presumption that future expanded transmission capacity would be needed within the corridor, and the comment requests additional environmental review for those activities.

See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) for information on the level of potential “future” construction considered to be necessary or foreseeable at this time. The EIS presents substantial evidence demonstrating that the Phased Build Alternative accurately describes the whole of the action proposed under that alternative, including its ability to accommodate and provide transmission capacity for all reasonably foreseeable electricity generation projects. More information regarding the need for additional environmental review of the Phased Build Alternative is discussed in responses to comments made by SCE (Responses to Comments F1-12 and F1-13). See Response to Comment F1-11 in response to concerns on outages during construction of the Phased Build Alternative.

B9-4 The comment indicates that a greater level of electrical resistive losses would occur with the Phased Build Alternative than would occur with the Proposed Project. The comment also indicates that higher losses may lead to additional environmental effects with the energy necessary to overcome the losses resulting in GHG emissions. The description of the alternative notes that the losses would be higher and that this issue is primarily a cost concern that can be balanced within the overall consideration of lower construction costs achieved with the alternative.

The actual level of resistive losses depends on actual line loading, which would continuously vary, and the potential sources of energy that would need to change dispatch to overcome the losses have not been identified. Because the dispatch would vary, discerning the changes in GHG emissions would require a production simulation modeling effort, which is beyond the scope of the EIR. As with the Proposed Project, the alternative aims to facilitate transmission from renewable energy resources. Although changes in GHG emissions are not quantified, primarily renewable resources contribute to the need for upgrading the corridor (as in Table A-4, Projects Contributing to Need for WOD Upgrade Project), and any potential incremental GHG emissions would be minimized by the low levels of GHG emissions from the upstream electric generation facilities.

The description of the Phased Build Alternative (Section 4.4 in Appendix 5) and the discussion of GHG impacts (in Climate Change, Section D.6.4.3, Phased Build Alternative) have been revised to qualitatively reflect this consideration.

B9-5 The comment describes technical considerations related to analyzing the need for deliverability. General Response GR-2 notes that the power flow analysis in the EIS does not include a formal study of deliverability. Conducting a comprehensive deliverability study in a manner consistent with the CAISO’s deliverability study methodology is beyond the scope of the EIS, which focuses on a comparative analysis of the Proposed Project and its alternatives and determining whether the alternatives to the Proposed Project are feasible and help avoid or minimize effects of the Proposed Project.

The comment states that levels of generation listed from the interconnection queue in the EIS are incremental to baseline conditions, and a higher level of deliverability should be targeted instead of the minimum level of 2,200 MW. The EIS recognizes that the 2013 West of Devers Interim Project presently provides deliverability to 985 MW of installed renewable generation from projects that have Full Capacity Deliverability Status (FCDS) in the baseline conditions. These baseline projects are included in the various power flow modeling scenarios, including at the level of dispatch modeled with the 2024 Reliability Base Case in Case #3. EIS Section B, Description of the Proposed Project, and the EIS power flow analysis

recognize that the 2013 West of Devers Interim Project (EIS Section B.1.1) would be removed as part of the Proposed Project, and accordingly, it is not part of the modeling of the alternative. See General Response GR-2 for a discussion of the agency-specific Basic Project Objectives.

The 2,200 MW level that appears in Basic Project Objective 1 is from the CAISO's Transition Cluster Generation Interconnection Study from 2010. The power flow analysis provided information on generation levels potentially going beyond the 2,200 MW value for the region. The EIS uses this information to explore the actual development activities of new generation as viewed from contract activity and CAISO generation queue activity (EIS Appendix 5, Attachment 2, pp. 4-7), to demonstrate a basis in finding the Phased Build Alternative to be a potentially feasible alternative.

In defining the 2,200 MW level, the EIS recognizes that previously-queued serial projects as well as existing connected generation would have already been deemed "deliverable", either through the application of generator-specific upgrades, or through the existing available transmission system capacity. The power flow modeling then directly compares the topology of the Phased Build Alternative to the Proposed Project to explore the differences in performance with all other assumptions being equal, within the seven cases or scenarios. As noted by the commenter, the analysis was conducted prior to the availability of Cluster 8 case data; however, while conditions have changed and will continue to change, the EIS accurately recognizes that the interconnection queue changes often. The changing nature of generation planned in the region may ultimately reveal through the CPUC general proceeding that the Phased Build Alternative is infeasible.

The "holistic" and "forward looking" review of information requested by the comment occurs in the CPUC general proceeding. The topic of whether the alternative is feasible is clearly within the scope of the CPUC general proceeding and evidentiary hearing, as described in General Response GR-1.

B9-6 The comment claims that the Draft EIR/EIS inappropriately uses the CAISO 2024 Reliability Base Case in establishing deliverability. The comment points to the generation level tabulated within the power flow analysis from this modeling case and notes that the CAISO adjusts dispatch as necessary in the Reliability Base Case to test the reliability of the system.

The EIS shows that the Reliability Base Case represents 6,901 MW of installed generation capacity across the entire power flow study region, upstream and downstream of the West of Devers corridor, dispatched at 3,754 MW online (Section A.2.3, CPUC and BLM Project Objectives; as detailed in Table A4 of EIS Appendix 5, Attachment 2, p. 21). To model the alternative in a manner consistent with the CAISO cases, the power flow analysis did not adjust any dispatch levels.

The Power Flow Analysis Approach (EIS Appendix 5, Attachment 2, p.7) describes how the Reliability Base Case was used as a means of screening out speculative generation, and the Cluster 7, Phase 1 case was used as a means of testing deliverability. The power flow analysis in the EIS does not include a formal study of deliverability. Conducting a comprehensive deliverability study in a manner consistent with the CAISO's deliverability study methodology is beyond the scope of the EIS, which focuses on determining whether the alternatives are feasible.

The power flow analysis shows the level of dispatch modeled for the Phased Build Alternative in Case #3, which uses the 2024 Reliability Base Case. At Red Bluff and Colorado River Substations, the 2024 Reliability Base Case includes 1,387 MW online, and this is a representation of 3,853 MW of installed renewable resource capacity at these interconnection points, after accounting for dispatch at the 36 percent capacity factor that is set in the Reliability Base Case. Notably, the 3,853 MW of installed capacity in Case #3 is also a level sufficient to accommodate the 3,800 MW Riverside East renewable resource portfolio in the transmission planning process, as transmitted in the March 11, 2015 letter from the CPUC to CAISO (identified by Comment B9-2). The EIS power flow analysis of Case #3 also includes the import of 1,400 MW from Imperial Irrigation District.

Although the EIS need not consider speculative generation, the highest level of dispatch appears within power flow modeling Case #6, which is a worst-case scenario of all foreseeable generation projects (the Cluster 7, Phase I case plus an additional 1,400 MW from the Imperial Valley). This scenario represents generation at a level that would be greater than anticipated, and the conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12).

This topic is also addressed in Response to Comment F1-6 (SCE's cover letter).

B9-7 The comment states that the EIR includes an incorrect assumption by modeling scenarios with 1,400 MW of imports from the Imperial Irrigation District (IID). This assumption was conservatively included in the power flow analysis and evaluated as a sensitivity to determine an upper end of the loading spectrum. The power flow analysis compares the performance of the Proposed Project with the alternative in terms of the electrical loads that occur on the lines, and including the imports from IID shows a conservatively high level of loading. Although utilities presently do not need to plan according to this assumption, retaining this scenario conservatively tests the performance of the Proposed Project and the Phased Build Alternative. Removing this level of import, as suggested by the comment, should indicate a lower level of loading and better levels of performance.

B9-8 The comment states that the Draft EIR/EIS appears to assess "the impacts of the Phased Build Alternative on generation development" in comparison with the Proposed Project. As noted by the comment, the power flow analysis provides a comparative benchmarking of performance of the alternative against the project. However, the comparison in the power flow analysis is not an assessment of "impacts" on generation project development activity. General Response GR-1 addresses the scope of projects contributing to the need for the Proposed Project and connected actions. See also General Response GR-2 on the obligation to consider a range of potentially feasible alternatives that is not unduly limited.

Separate from the power flow analysis, the EIS, in Section B.7.1, Definition of Connected Action Projects, recognizes that some generation projects are so closely related to the Proposed Project as to be considered "connected actions," and the EIS also provides information on the environmental impacts of these, as well as cumulative projects and projects that could fill a remaining growth-inducing capacity (as categorized in Section A.3, Definition of Connected Actions and Related Projects), shown in Section F.1.3, Growth Related to Development of Additional Power Generation Facilities.

The comment also indicates that CAISO intends to conduct a comparative analysis of project alternatives using the CAISO's deliverability study methodology, and CAISO intends to

present its results in testimony in the CPUC general proceeding (A.13-10-020). As described in previous responses, the EIS does not include a formal study of deliverability. This topic is addressed in more detail in Responses to Comments B9-5 and B9-6.

B9-9 The comment asserts that the Draft EIR/EIS includes an incorrect implication that the Phased Build Alternative would satisfy power flows associated with the Cluster 7, Phase 1 case in Case #4 (EIS Appendix 5, Attachment 2, p.10-11). However, Case #4 of the power flow analysis relates to the Proposed Project and not the Phased Build Alternative, which is tested in Case #6 with the same level of generation as Case #4 plus the import of 1,400 MW from IID. The conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p.12).

B9-10 The comment requests that the EIS include information on the potential need to re-string the conductors in the Phased Build Alternative as such future work could result in additional environmental impacts.

The Phased Build Alternative includes ability to allow for future capacity expansion through future reconductoring, if needed (EIS Appendix 5, p.Ap.5-46), but the need for such future work is not yet foreseeable. See General Response GR-4 on the need for “future phases” of construction under the Phased Build Alternative and Response to Comment F1-13.

The comment notes that de-energizing circuits for an outage could be necessary during construction and that this could create a change in dispatch, should it occur as necessary to accommodate outages. This comment is similar to a comment from SCE (Comment F1-11) that construction of the Phased Build Alternative would result in the potential for outages that could influence generator dispatch, or generator curtailment and the associated economic loss. The comment indicates that a greater level of curtailment of renewable generation could occur with the Phased Build Alternative during outages than would occur with the Proposed Project. The potential market impacts of such outages would be economic impacts beyond the scope of the EIS analysis. Determining the potential environmental effects of changing dispatch or curtailment patterns would also be beyond the scope of EIS analysis and speculative. Additional and updated information on the topic of upgrading the corridor after the implementation of the Phased Build Alternative appears in General Response GR-4.

B9-11 The comment indicates that a greater level of electrical losses would occur with the Phased Build Alternative than would occur with the Proposed Project. See Response to Comment B9-4 for a discussion of the higher resistive losses related to the Phased Build Alternative.

B9-12 The comment indicates closing remarks for EIR/EIS comments and the intent to present testimony in the CPUC general proceeding for this project (A.13-10-020). No further response is required as the comment does not raise any new or significant environmental issues.

B9-13 The comment includes a copy of the May 2010 MOU between CAISO and CPUC on the Revised ISO Transmission Planning Process. The Proposed Project predates the first implementation of the Revised ISO Transmission Planning Process because it was identified earlier by CAISO in 2010 as a required Delivery Network Upgrade for specific LGIA's. General Response GR-3 provides a review of the Transmission Planning Process and its relationship to the environmental review for this project-level request for a CPCN.

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