Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Glenn Sias
Title: Manager
Dated: 08/21/2008

Question 01:

Alternative 4: EMF

Background:
Alternative Route 4 as described and illustrated in the PEA leaves the Rector Substation running to the west for 0.5 mile, then turns south 2.3 miles and then turns east to paralleling Avenue 264 to Parkside Avenue. The western end of the route could be shortened by using about 2 miles of the ROW of the existing Rector-Vestal 220 kV lines between Rector and Avenue 264 rather than running from Rector to the west and then south prior to turning east along Avenue 264. This route change would mitigate some of the potential visual and land use issues. The new line length would be about 1.7 miles shorter than for the route as shown in the PEA, and would reduce the requirement for new ROW by 3.7 miles. Also, a crossover of the existing 220 kV lines by the new lines could be avoided. Using the existing easement would require reconstructing the existing lines for approximately 2 miles similar to the proposals for Alternatives 1, 2, and 3 using the existing easement north from Rector to Big Creek. However, SCE indicated use of the existing 220 kV transmission route south could create an EMF issue with a school located on the east side of Road 148 just north of Visalia Road (Caldwell Avenue) near Rector Substation. Using Google Earth, the school property appears to be approximately 100 feet from the nearest existing 220 kV conductor.

What is the distance from the east edge of the existing easement to the school property boundary?

Response to Question 01:

Alternative Route 4 and any modifications associated with Alternative Route 4 were not investigated for reasons discussed in Data Request #3, Question 8. However, SCE believes the distance from the east edge of the existing easement to the school property boundary is approximately 60 feet.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Glenn Sias
Title: Manager
Dated: 08/21/2008

Question 02:

Alternative 4: EMF

Background:
Alternative Route 4 as described and illustrated in the PEA leaves the Rector Substation running to the west for 0.5 mile, then turns south 2.3 miles and then turns east to paralleling Avenue 264 to Parkside Avenue. The western end of the route could be shortened by using about 2 miles of the ROW of the existing Rector-Vestal 220 kV lines between Rector and Avenue 264 rather than running from Rector to the west and then south prior to turning east along Avenue 264. This route change would mitigate some of the potential visual and land use issues. The new line length would be about 1.7 miles shorter than for the route as shown in the PEA, and would reduce the requirement for new ROW by 3.7 miles. Also, a crossover of the existing 220 kV lines by the new lines could be avoided. Using the existing easement would require reconstructing the existing lines for approximately 2 miles similar to the proposals for Alternatives 1, 2, and 3 using the existing easement north from Rector to Big Creek. However, SCE indicated use of the existing 220 kV transmission route south could create an EMF issue with a school located on the east side of Road 148 just north of Visalia Road (Caldwell Avenue) near Rector Substation. Using Google Earth, the school property appears to be approximately 100 feet from the nearest existing 220 kV conductor.

What are the specific EMF regulatory requirements for the construction of new power lines in the vicinity of schools that resulted in your decision to avoid the existing ROW in that area?

Response to Question 02:

The California Public Utilities Commission's (CPUC's) EMF policy (established in 1993) requires SCE to incorporate low-or-no cost field reduction measures into the design of all new power lines, substations, and electrical facilities. In 2006, the CPUC updated its EMF Policy in Decision 06-01-042 re-affirming that health hazards from exposures to EMF have not been established and that the existing no-cost and low-cost precautionary-based EMF Policy should be continued. The 2006 decision also established land usage categories and directs the utilities to give the highest priority to schools and day-care facilities for applying low-cost magnetic field reduction measures to new projects. Furthermore, the CPUC also

recognized the existing California Department of Education's (CDE's) EMF siting guidelines for new schools which recommends new school sites be located at least 150 feet from existing 220 kV transmission lines. In Decision 06-01-042, the CPUC directed utilities to meet with CDE and develop additional design criteria. (CPUC Decision 06-01-042, p. 9). The result is the updated CDE's "Power Line Setback Exemption Guidance – May 2006." The CDE's updated EMF guidance recognized the CPUC's jurisdiction over utilities for evaluating and implementing no-cost and low-cost magnetic field reduction measures for new or upgraded transmission lines near existing schools stating that "the proposed guidance acknowledges the scientific uncertainty of the health effects of EMFs, the lack of any state or nationally established standard for EMF exposure, and the [C]PUC's recently reconfirmed reliance upon no/low-cost measures targeted to only reduce fields from new power transmission lines… In addition, the [C]PUC specifies responsibilities of power transmission line owners and operators that are upgrading or locating lines near school."(CDE, "Power Line Setback Exemption Guidance – May 2006," p. 1)

Possible low-cost field reduction measures for addressing new power lines near schools may include choosing a different route to route the proposed power lines away from the school as well as phasing power lines to reduce magnetic fields and using taller structures. Alternative 4 has not been evaluated for field reduction measures to comply with the CPUC's EMF policy. Should this route be chosen as a preferred route, the field management plan for the proposed project will be amended to include an EMF analysis for Alternative 4.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Glenn Sias
Title: Manager
Dated: 08/21/2008

Question 03:

Alternative 4: EMF

Background:
Alternative Route 4 as described and illustrated in the PEA leaves the Rector Substation running to the west for 0.5 mile, then turns south 2.3 miles and then turns east to paralleling Avenue 264 to Parkside Avenue. The western end of the route could be shortened by using about 2 miles of the ROW of the existing Rector-Vestal 220 kV lines between Rector and Avenue 264 rather than running from Rector to the west and then south prior to turning east along Avenue 264. This route change would mitigate some of the potential visual and land use issues. The new line length would be about 1.7 miles shorter than for the route as shown in the PEA, and would reduce the requirement for new ROW by 3.7 miles. Also, a crossover of the existing 220 kV lines by the new lines could be avoided. Using the existing easement would require reconstructing the existing lines for approximately 2 miles similar to the proposals for Alternatives 1, 2, and 3 using the existing easement north from Rector to Big Creek. However, SCE indicated use of the existing 220 kV transmission route south could create an EMF issue with a school located on the east side of Road 148 just north of Visalia Road (Caldwell Avenue) near Rector Substation. Using Google Earth, the school property appears to be approximately 100 feet from the nearest existing 220 kV conductor.

Does the EMF of the existing transmission lines violate those regulatory requirements?

Response to Question 03:

No. The CPUC's EMF Policy does not require utilities to implement no-cost and low-cost magnetic field reduction measures for existing transmission lines.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Glenn Sias
Title: Manager
Dated: 08/21/2008

Question 04:

Alternative 4: EMF

Background:
Alternative Route 4 as described and illustrated in the PEA leaves the Rector Substation running to the west for 0.5 mile, then turns south 2.3 miles and then turns east to paralleling Avenue 264 to Parkside Avenue. The western end of the route could be shortened by using about 2 miles of the ROW of the existing Rector-Vestal 220 kV lines between Rector and Avenue 264 rather than running from Rector to the west and then south prior to turning east along Avenue 264. This route change would mitigate some of the potential visual and land use issues. The new line length would be about 1.7 miles shorter than for the route as shown in the PEA, and would reduce the requirement for new ROW by 3.7 miles. Also, a crossover of the existing 220 kV lines by the new lines could be avoided. Using the existing easement would require reconstructing the existing lines for approximately 2 miles similar to the proposals for Alternatives 1, 2, and 3 using the existing easement north from Rector to Big Creek. However, SCE indicated use of the existing 220 kV transmission route south could create an EMF issue with a school located on the east side of Road 148 just north of Visalia Road (Caldwell Avenue) near Rector Substation. Using Google Earth, the school property appears to be approximately 100 feet from the nearest existing 220 kV conductor.

Could the existing and proposed new 220 kV power lines in the vicinity of the school be configured to meet the current EMF regulatory requirements regarding the school?

Response to Question 04:

See Response to Data Request #4, Questions 2 and 3.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Glenn Sias
Title: Manager
Dated: 08/21/2008

Question 05:

Alternative 4: EMF

Background:
Alternative Route 4 as described and illustrated in the PEA leaves the Rector Substation running to the west for 0.5 mile, then turns south 2.3 miles and then turns east to paralleling Avenue 264 to Parkside Avenue. The western end of the route could be shortened by using about 2 miles of the ROW of the existing Rector-Vestal 220 kV lines between Rector and Avenue 264 rather than running from Rector to the west and then south prior to turning east along Avenue 264. This route change would mitigate some of the potential visual and land use issues. The new line length would be about 1.7 miles shorter than for the route as shown in the PEA, and would reduce the requirement for new ROW by 3.7 miles. Also, a crossover of the existing 220 kV lines by the new lines could be avoided. Using the existing easement would require reconstructing the existing lines for approximately 2 miles similar to the proposals for Alternatives 1, 2, and 3 using the existing easement north from Rector to Big Creek. However, SCE indicated use of the existing 220 kV transmission route south could create an EMF issue with a school located on the east side of Road 148 just north of Visalia Road (Caldwell Avenue) near Rector Substation. Using Google Earth, the school property appears to be approximately 100 feet from the nearest existing 220 kV conductor.

Would under-grounding and shielding the new transmission lines in the vicinity of the school resolve the EMF issue?

Response to Question 05:

Alternative 4 as modified by the question has not been evaluated for field reduction measures to comply with the CPUC's EMF policy. Possible low-cost measures for this alternative may include phasing power lines to reduce magnetic fields and using taller structures. Undergrounding the proposed 220 kV transmission lines would likely not result in significant magnetic field reductions due to existing overhead 220 kV transmission lines within the right-of-way and may not be a low-cost field reduction measure. Furthermore, shielding underground transmission lines is not a standardized (among utilities - including members of California Municipal Utilities Association) low-cost magnetic field reduction option.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Robert J. Tucker
Title: Power System Planner
Dated: 08/21/2008

Question 06:

Reconductoring with ACCR

Background:
The Comprehensive Report of Appendix C of the PEA indicates that the largest and highest capacity conductor that could be accommodated by the existing towers would be 666.6 kcmil ACSS/TW, only slightly larger than the existing 605 kcmil ACSR on the BC-Rector, Vestal-Magunden, and the BC4-Springville-Magunden lines. BC3-Springville-Magunden is currently 1033 kcmil ACSR (aluminum conductor steel reinforced) conductor.

However ACSS/TW may not be the highest capacity product currently available for reconductoring. There are several new high capacity cable products are now being manufactured and adopted by utilities for upgrade projects. For example, an article on 3M's website states that, "*3M ACCR can carry twice the current of conventional steel-core conductors of the same diameter, without requiring larger towers, even across long spans* ." (See Attachment A for additional articles).

Why has SCE apparently not considered use of ACCR conductors for upgrading the 220 kV transmission serving the Rector Substation?

Response to Question 06:

SCE did consider use of ACCR conductors for upgrading the 220 kV transmission lines serving the Rector Substation. SCE focused on ACSS/TW conductors because SCE has recent experience with installation of ACSS/TW conductors in other portions of the SCE 220-kV transmission system. In those instances, ACSS/TW had been selected over ACCR, in part, because it was found to have essentially the same electrical performance as ACCR but at a lower total cost.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Robert J. Tucker
Title: Power System Planner
Dated: 08/21/2008

Question 07:

Reconductoring with ACCR

Background:
The Comprehensive Report of Appendix C of the PEA indicates that the largest and highest capacity conductor that could be accommodated by the existing towers would be 666.6 kcmil ACSS/TW, only slightly larger than the existing 605 kcmil ACSR on the BC-Rector, Vestal-Magunden, and the BC4-Springville-Magunden lines. BC3-Springville-Magunden is currently 1033 kcmil ACSR (aluminum conductor steel reinforced) conductor.

However ACSS/TW may not be the highest capacity product currently available for reconductoring. There are several new high capacity cable products are now being manufactured and adopted by utilities for upgrade projects. For example, an article on 3M's website states that, "*3M ACCR can carry twice the current of conventional steel-core conductors of the same diameter, without requiring larger towers, even across long spans* ." (See Attachment A for additional articles).

How would the conductivity and other critical properties of 3M ACCR compare to ACSS/TW identified in the 2004 Comprehensive Report?

Response to Question 07:

The thermal capability of 3M ACCR conductors and ACSS/TW conductors are comparable to each other, and the electrical impedance characteristics of each are essentially identical.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Robert J. Tucker
Title: Power System Planner
Dated: 08/21/2008

Question 08:

Reconductoring with ACCR

Background:
The Comprehensive Report of Appendix C of the PEA indicates that the largest and highest capacity conductor that could be accommodated by the existing towers would be 666.6 kcmil ACSS/TW, only slightly larger than the existing 605 kcmil ACSR on the BC-Rector, Vestal-Magunden, and the BC4-Springville-Magunden lines. BC3-Springville-Magunden is currently 1033 kcmil ACSR (aluminum conductor steel reinforced) conductor.

However ACSS/TW may not be the highest capacity product currently available for reconductoring. There are several new high capacity cable products are now being manufactured and adopted by utilities for upgrade projects. For example, an article on 3M's website states that, "*3M ACCR can carry twice the current of conventional steel-core conductors of the same diameter, without requiring larger towers, even across long spans* ." (See Attachment A for additional articles).

Would doubling the capacity of the Big Creek 1 and 3 – Rector lines and the two Rector – Vestal – Magunden lines using ACCR meet SCE's project objectives for improved capacity and reliability including scenarios for simultaneous outages on any two of the four lines serving Rector?

Response to Question 08:

No. Reconductoring was discussed in the PEA, Section 2.1.2 System Alternatives Considered (Page 2-3), as well as in SCE's previously submitted responses to CPUC Data Request #1, question 33 and CPUC Data Request #3, question 5. The replacement of "ACSS/TW" with "ACCR" would not make reconductoring a viable project alternative.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Robert J. Tucker
Title: Power System Planner
Dated: 08/21/2008

Question 09:

Reconductoring with ACCR

Background:
The Comprehensive Report of Appendix C of the PEA indicates that the largest and highest capacity conductor that could be accommodated by the existing towers would be 666.6 kcmil ACSS/TW, only slightly larger than the existing 605 kcmil ACSR on the BC-Rector, Vestal-Magunden, and the BC4-Springville-Magunden lines. BC3-Springville-Magunden is currently 1033 kcmil ACSR (aluminum conductor steel reinforced) conductor.

However ACSS/TW may not be the highest capacity product currently available for reconductoring. There are several new high capacity cable products are now being manufactured and adopted by utilities for upgrade projects. For example, an article on 3M's website states that, "*3M ACCR can carry twice the current of conventional steel-core conductors of the same diameter, without requiring larger towers, even across long spans* ." (See Attachment A for additional articles).

Would reconductoring only one Big-Creek – Rector line and one Rector – Vestal – Magunden line with ACCR meet the project objectives in the near term allowing the upgrade of the other Big Creek - Rector –Vestal – Magunden line to be deferred for one or more years? If yes, how many years could the upgrade of the second line be deferred? (Obviously simultaneous outages of the two upgraded lines would leave Rector in the same situation as the existing system with any two lines down. But the likelihood of simultaneous outages on the two upgraded lines would be substantially less than the likelihood of simultaneous outages on any two of the existing four lines.)

Response to Question 09:

No, reconductoring only one Big Creek-Rector line and one Rector-Vestal-Magunden line with ACCR would not meet the project objectives in the near term allowing the upgrade of the other line to be deferred. Such an upgrade would still result in base-case and N-1/N-2 overloads and would not meet reliability criteria.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Robert J. Tucker
Title: Power System Planner
Dated: 08/21/2008

Question 10:

Reconductoring with ACCR

Background:
The Comprehensive Report of Appendix C of the PEA indicates that the largest and highest capacity conductor that could be accommodated by the existing towers would be 666.6 kcmil ACSS/TW, only slightly larger than the existing 605 kcmil ACSR on the BC-Rector, Vestal-Magunden, and the BC4-Springville-Magunden lines. BC3-Springville-Magunden is currently 1033 kcmil ACSR (aluminum conductor steel reinforced) conductor.

However ACSS/TW may not be the highest capacity product currently available for reconductoring. There are several new high capacity cable products are now being manufactured and adopted by utilities for upgrade projects. For example, an article on 3M's website states that, "*3M ACCR can carry twice the current of conventional steel-core conductors of the same diameter, without requiring larger towers, even across long spans* ." (See Attachment A for additional articles).

In general, how would the cost of a reconductoring alternative using 3M ACCR (or similar high capacity conductor) compare to ACSS/TW conductors?

Response to Question 10:

As stated in SCE's previously submitted response to CPUC Data Request #3, question 5(c), the potential cost of reconductoring with ACSS/TW has not been investigated. In previous reconductor projects in the SCE 220-kV transmission system, ACSS/TW had been selected over ACCR, in part, because it was found to have essentially the same electrical performance as ACCR but at a lower total cost.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Ryan M. Myers
Title: Land Services Agent
Dated: 08/21/2008

Question 11:

Federal Energy Regulatory Agency (FERC) Jurisdiction Over Hydroelectric Project Related Transmission Lines

Background:
The four 220 kV transmission lines from the Big Creek Hydroelectric Projects to the Rector and Springville Substations may be included as "project facilities" in the several FERC hydroelectric licenses for the for the Big Creek hydro projects. These licenses include:

License No. 67	Big Creek 2A, Big Creek 8, Balsam Meadows
License No. 120	Big Creek 3
License No. 2085	Mammoth Pool
License No. 2175	Big Creek 1, Big Creek 2
License No. ????	Big Creek 4

Presuming that the subject transmission lines are included in the FERC hydro licenses, FERC would have jurisdiction over the transmission lines in regards to any significant physical changes, or upgrades. Thus, the proposed SJXVL Transmission Project modifications may require FERC "license amendment" applications supporting Federal NEPA reviews and approvals in addition to meeting CEQA requirements. (Applicable excerpts for the FERC "Compliance Handbook" are included as Attachment B)

Are the Big Creek 1 – Rector, Big Creek 3 – Rector, Big Creek 3 – Springville, and Big Creek 4 – Springville 220 kV transmission lines included in the FERC hydro project licenses? If so, how far along the lines does that jurisdiction extend? Would it stop at the Rector and Springville substations?

Response to Question 11:

The Big Creek 1 - Rector, Big Creek 3 - Rector, Big Creek 3 - Springville, and Big Creek 4 - Springville 220 kV transmission lines are not included in the current abovementioned FERC hydro project licenses.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Ryan M. Myers
Title: Land Services Agent
Dated: 08/21/2008

Question 12:

Federal Energy Regulatory Agency (FERC) Jurisdiction Over Hydroelectric Project Related Transmission Lines

Background:
The four 220 kV transmission lines from the Big Creek Hydroelectric Projects to the Rector and Springville Substations may be included as "project facilities" in the several FERC hydroelectric licenses for the for the Big Creek hydro projects. These licenses include:

License No. 67	Big Creek 2A, Big Creek 8, Balsam Meadows
License No. 120	Big Creek 3
License No. 2085	Mammoth Pool
License No. 2175	Big Creek 1, Big Creek 2
License No. ????	Big Creek 4

Presuming that the subject transmission lines are included in the FERC hydro licenses, FERC would have jurisdiction over the transmission lines in regards to any significant physical changes, or upgrades. Thus, the proposed SJXVL Transmission Project modifications may require FERC "license amendment" applications supporting Federal NEPA reviews and approvals in addition to meeting CEQA requirements. (Applicable excerpts for the FERC "Compliance Handbook" are included as Attachment B)

Will FERC require hydro project license amendments for the proposed SJXVL Project transmission modifications?

Response to Question 12:

No. See answer to CPUC Data Request No. 4, question No. 11 above.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Richard Tom
Title: Senior Attorney
Dated: 08/21/2008

Question 13:

Federal Energy Regulatory Agency (FERC) Jurisdiction Over Hydroelectric Project Related Transmission Lines

Background:
The four 220 kV transmission lines from the Big Creek Hydroelectric Projects to the Rector and Springville Substations may be included as "project facilities" in the several FERC hydroelectric licenses for the for the Big Creek hydro projects. These licenses include:

License No. 67	Big Creek 2A, Big Creek 8, Balsam Meadows
License No. 120	Big Creek 3
License No. 2085	Mammoth Pool
License No. 2175	Big Creek 1, Big Creek 2
License No. ????	Big Creek 4

Presuming that the subject transmission lines are included in the FERC hydro licenses, FERC would have jurisdiction over the transmission lines in regards to any significant physical changes, or upgrades. Thus, the proposed SJXVL Transmission Project modifications may require FERC "license amendment" applications supporting Federal NEPA reviews and approvals in addition to meeting CEQA requirements. (Applicable excerpts for the FERC "Compliance Handbook" are included as Attachment B)

If the transmission lines are not covered in the FERC licenses, does FERC still have a jurisdictional role over the transmission lines under the Interstate Commerce Act?

Response to Question 13:

It is SCE's understanding that FERC has jurisdiction over the subject transmission lines for matters including interconnection and wholesale ratemaking. However, it is also SCE's understanding that FERC does not have a jurisdictional role over the transmission lines and the proposed project for purposes of environmental review and approval.

Southern California Edison
San Joaquin Cross Valley Loop Project A.08-05-039

DATA REQUEST SET SJXVL CPUC-ED-04

To: ENERGY DIVISION
Prepared by: Richard Tom
Title: Senior Attorney
Dated: 08/21/2008

Question 14:

Federal Energy Regulatory Agency (FERC) Jurisdiction Over Hydroelectric Project Related Transmission Lines

Background:
The four 220 kV transmission lines from the Big Creek Hydroelectric Projects to the Rector and Springville Substations may be included as "project facilities" in the several FERC hydroelectric licenses for the for the Big Creek hydro projects. These licenses include:

License No. 67	Big Creek 2A, Big Creek 8, Balsam Meadows
License No. 120	Big Creek 3
License No. 2085	Mammoth Pool
License No. 2175	Big Creek 1, Big Creek 2
License No. ????	Big Creek 4

Presuming that the subject transmission lines are included in the FERC hydro licenses, FERC would have jurisdiction over the transmission lines in regards to any significant physical changes, or upgrades. Thus, the proposed SJXVL Transmission Project modifications may require FERC "license amendment" applications supporting Federal NEPA reviews and approvals in addition to meeting CEQA requirements. (Applicable excerpts for the FERC "Compliance Handbook" are included as Attachment B)

Assuming the answer to Question 3 is affirmative, what type of application and regulatory process will FERC require for Project approval?

Response to Question 14:

As noted above in response to CPUC Data Request No. 4, Question No. 11, the subject transmission lines are not included in the FERC hydro project licenses. As such, it is SCE's understanding that there is no application and regulatory process and no approval required at FERC for this proposed project.