

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN
CALIFORNIA EDISON COMPANY (U 338-E)
for a Permit to Construct Electrical Facilities with
Voltages Over 200 kV: Eldorado-Pisgah-Lugo
Transmission Line Rating Remediation Project.

A.23-04-009

**AMENDED APPLICATION OF SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E) FOR A PERMIT TO CONSTRUCT
FOR THE ELDORADO-PISGAH-LUGO TRANSMISSION LINE
RATING REMEDIATION PROJECT**

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I.

INTRODUCTION

Pursuant to California Public Utilities Commission (“Commission” or “CPUC”) Rule of Practice and Procedure 1.12¹ Southern California Edison Company (“SCE”) hereby submits this amended application (“Amended Application”) for a Permit to Construct (“PTC”) the Eldorado-Pisgah-Lugo (“EPL”) Transmission Line Rating Remediation (“TLRR”) Project (“EPL Project” or “Proposed Project”). The purpose of the EPL Project is to remediate physical clearance discrepancies identified on some of SCE’s existing 220 kilovolt (“kV”) transmission lines while continuing to provide safe and reliable electric service. In order to reflect the relief SCE seeks in this Amended Application, the caption of the proceeding has been revised to indicate that this

¹ Rule 1.12(a) states that amendments to applications should be filed prior to the issuance of a scoping memo.

Amended Application seeks a PTC rather than a Certificate of Public Convenience and Necessity (“CPCN”).

II.

PROJECT SCOPE AND BACKGROUND

The EPL Project is designed to bring portions of existing transmission lines into compliance with physical clearance standards while maintaining the existing line rating for the affected circuits, and to ensure that SCE is able to continue to provide safe and reliable electric service.

The EPL Project proposes to address portions of transmission lines in both California and Nevada. With respect to the California portion, CPUC General Order 95 (“G.O. 95”) Rules 37 through 39 specify minimum vertical and horizontal clearances to be maintained between an electrical conductor and other conductors, or between a conductor and the ground, buildings, and a variety of other objects. The design of electric lines in Nevada is governed by the standards contained in Section 23 of the National Electrical Safety Code (“NESC”), which provides vertical and horizontal clearances applicable in Nevada.

In 2006, SCE identified discrepancies along many of its circuits where minimum clearances are not being met compared to G.O. 95 standards. In response, SCE established its TLRR Program. The TLRR Program is focused on developing and implementing engineering solutions for each identified discrepancy to bring the circuits into compliance with standards contained in G.O. 95, thereby maintaining the line ratings reflected in the California Independent System Operator (“CAISO”) Transmission Register. SCE is committed to undertaking all reasonable efforts to correct known discrepancies as soon as practicable.

Pursuant to the TLRR Program, SCE identified G.O. 95 discrepancies along those portions of the following existing transmission line circuits located in unincorporated San Bernardino County and the City of Hesperia within the State of California, and NESC Section 23 discrepancies on those portions of these transmission line circuits located in unincorporated Clark County and the City of Boulder City within the State of Nevada:

- Lugo-Pisgah No.1 220 kV Transmission Line
- Lugo-Pisgah No.2 220 kV Transmission Line
- Cima-Eldorado-Pisgah No.1 220 kV Transmission Line
- Cima-Eldorado-Pisgah No.2 220 kV Transmission Line

The work needed to remediate the discrepancies on these specific circuits constitutes the scope of the EPL Project, and includes the installation of new conductor, Overhead Ground Wire (“OHGW”), inter-set structures, and the modification or replacement of hardware and insulators, all of which will be engineered and constructed to meet G.O. 95 (for portions of the circuits in California) and NESC Section 23 (for portions of the circuits in Nevada) standards. The EPL Project would also involve minor modifications at the Cima substation and Pisgah switchyard. The primary objective of the EPL Project is to remediate identified discrepancies and bring the California portion of the EPL Project transmission lines into full compliance with the standards contained in G.O. 95 Rules 37 through Rule 39 and to bring the Nevada portion of the EPL Project transmission lines into full compliance with NESC Section 23 standards.² Remediation of the discrepancies will also bring the lines into operational compliance with SCE’s published facility rating methodology and compliance with applicable North American Reliability Corporation (“NERC”) reliability standards. Realization of the primary objective will also meet a secondary objective of continuing to provide safe and reliable electrical service, as remediation of the identified discrepancies will address safety and reliability concerns related to the condition of existing infrastructure on the affected transmission lines. Discrepancy remediation will maintain overall reliability by replacing existing conductor and OHGW with new conductor and OHGW, reducing the reliability risks posed by the discrepancies.

SCE considered a variety of ways to construct the EPL Project. SCE believes the EPL Project proposed in this Amended Application represents the optimized design—it meets the

² As with all of SCE’s TLRR Projects, the EPL Project is designed to meet project needs while minimizing environmental impacts; providing safe and reliable electrical service; and conforming with industry and/or SCE’s approved engineering, design, and construction standards for transmission and transmission system projects.

identified objectives, is feasible to construct, and presents the least-intensive scope of work and the smallest physical footprint of any potential solutions identified by SCE. To avoid or reduce potential environmental impacts to the maximum feasible extent, most of the work under the EPL Project will be performed within an existing transmission line corridor, utilizing existing disturbed areas and access roads, thereby minimizing impacts to undisturbed sensitive environmental resources. The locations of the inter-set structures to be installed, and in some instances the orientation and configuration of construction work areas, were selected to avoid sensitive environmental resources and to avoid potential land use conflicts. In addition, the off-alignment staging yards have been preferentially sited on previously- or currently-disturbed areas, or in areas with degraded habitat where previously- or currently-disturbed areas are not available. The EPL Project will therefore both achieve the project objectives and minimize potential environmental impacts to the greatest feasible extent. As discussed in Chapter 5 of the Proponent's Environmental Assessment already submitted in this proceeding ("PEA," discussed further below), the EPL Project would not result in any potentially significant impacts under any CEQA impact category.

As discussed more fully in Chapter 4 of the PEA, even though the EPL Project would not result in any significant environmental impacts, SCE nevertheless identified and analyzed one feasible alternative to the EPL Project, the Partial Reconductor/Shorter Insulators Alternative, as well as a No Project Alternative. SCE also identified and analyzed several other alternatives to the EPL Project; these alternatives, and the criteria and rationale behind why each was rejected from further analysis, are presented in Chapter 4 of the PEA. Based on SCE's analysis of alternatives in the PEA, SCE has identified the EPL Project as its proposed project.

III.

PROCEDURAL HISTORY AND SUMMARY OF SCE'S REQUEST

On April 21, 2023, SCE filed an Application for a CPCN along with a PEA for the EPL Project ("CPCN Application" or "Original Application") under CPUC General Order 131-D ("G.O. 131-D"). In SCE's Original Application for the EPL Project, SCE explained that "[d]uring

the development of the EPL Project, the California Legislature adopted Senate Bill (“SB”) 529, providing relief from the requirements of a CPCN for the extension, expansion, upgrade, or other modification of an existing transmission line or substation, and directing the CPUC to revise G.O. 131-D to provide for the processing of such projects through the Permit to Construct (“PTC”) application process. Should the Commission revise G.O. 131-D such that the EPL Project qualifies for a PTC during the pendency of this Application, SCE requests that the Commission convert this Application into a request for a PTC and process it accordingly.”³

SB 529 directed the CPUC to revise G.O. 131-D to allow projects over 200kV that would extend, expand, upgrade, or modify an existing electrical transmission facility to receive approval via a PTC or, if applicable, claim an exemption to the need for approval, even if the project would previously have required approval via a CPCN.

Pursuant to this directive, on May 18, 2023, the CPUC initiated a rulemaking proceeding (R. 23-05-018) to update G.O. 131-D to implement the requirements of SB 529 to streamline and clarify permitting requirements for electrical transmission facilities. The CPUC also made several other changes and updates to G.O. 131-D to streamline project permitting, approval, and construction processes, resulting in the replacement of G.O. 131-D with G.O. 131-E, effective January 30, 2025.

Relevant here, G.O. 131-E Section III.A.2 provides (*emphasis added*):

The following project types, even if involving a transmission line, *do not require a CPCN*. In lieu of filing an application to obtain a CPCN, utilities are authorized to file a permit to construct application or claim an exemption for these project types under Section III.B:

³ *Application Of Southern California Edison Company (U 338-E) For A Certificate of Public Convenience and Necessity to Construct Electrical Facilities With Voltages Between 50kv And 200 kV: Eldorado-Pisgah-Lugo Transmission Line Rating Remediation Project*, filed April 21, 2023, p. 5.

a. An extension, expansion, upgrade, or other modification to an electric public utility's existing electrical transmission facilities, including electric transmission lines, substations, and switchyards within existing transmission easements, rights of way, or franchise agreements, irrespective of whether the electrical transmission facility is above a 200 kV voltage level.

As a result of these changes to the permitting process in G.O. 131-E, and because, as described in more detail below, the work proposed under the EPL Project constitutes an "upgrade" to an "existing electrical transmission facility," SCE requests that the Commission accept and approve this Amended Application seeking a PTC for the EPL Project.

G.O. 131-E Section 1.E defines an "existing electrical transmission facility" as a "transmission line, power line, substation, or switchyard that has been constructed for operation at or above 50 kV." The circuits that make up the EPL Project are existing 220 kV transmission lines, and are thus within the definition of "existing electrical transmission facility." G.O. 131-E Section 1.H defines an "upgrade" as the "replacement or alteration of existing electrical transmission facilities, or components thereof, to enhance the rating, voltage, capacity, capability, or quality of those facilities." Section 1.H.1 describes that as an example, an upgrade would include work resulting in "[r]econductoring existing transmission or power lines to use conductors with greater power transfer capability and/or increased voltage levels, where the reconductoring requires replacement of the existing supporting structures." The EPL Project would reconductor approximately 121 circuit miles of existing transmission lines to enhance the quality of the existing facilities. Additionally, the EPL Project would add 12 inter-set structures along the existing transmission line to support the reconductoring effort. The EPL Project scope therefore fits squarely within the G.O. 131-E definition of "upgrade."

SCE requests that the Commission, upon completion of its review of this Amended Application, issue and approve or certify an appropriate environmental document pursuant to CEQA, and issue a PTC authorizing SCE to construct the EPL Project as set forth in this

Amended Application and the PEA within the timelines set forth in Section VI of this Amended Application.

IV.

CHANGES REFLECTED IN THIS AMENDED APPLICATION

This Amended Application seeks a PTC, rather than a CPCN, for the EPL Project, consistent with G.O. 131-E. While the type of approval requested in this Application has changed, the scope of the EPL Project remains the same. Therefore, there are no changes to the PEA that was submitted with the Original Application. As such, SCE has not re-attached the PEA to this Amended Application.

In addition to the caption modification, certain amendments to the Original Application have been made to satisfy the requirements of a G.O. 131-E and update information that has changed since the Original Application was filed. SCE has prepared a redline showing the changes to the Original Application and has included it with this Amended Application as APPENDIX H with underlined text for additions and with strikethrough for text that has been deleted. None of these changes relate to the physical scope of the EPL Project, which remains as originally presented in the PEA's project description.

This Amended Application refers to several appendices included in the Original Application. Some of those appendices have been updated as part of this Amended Application, as noted below. The following appendices, along with the April 2023 PEA, are part of the Amended Application:

<u>APPENDIX A</u>	Project Schedule (updated)
<u>APPENDIX E</u>	Corporate Information and Articles of Incorporation (updated)
<u>APPENDIX F</u>	Balance Sheet and Statement of Income as of June 30, 2025 (updated)
<u>APPENDIX H</u>	Amendments to the <i>Application Of Southern California Edison Company (U 338-E) For A Certificate of Public Convenience and Necessity to Construct Electrical Facilities With Voltages Between 50kV And 200 kV: Eldorado Pisgah-Lugo Transmission Line Rating Remediation Project</i> , filed April 21, 2023 (new)

V.

PROJECT DESCRIPTION

The EPL Project work would impact (i) four existing transmission lines where discrepancies have been identified, and (ii) substations/switchyard connected to those transmission lines. The EPL Project's existing utility system comprises the following:

- Transmission Lines:
 - Lugo-Pisgah No.1 220 kV Transmission Line
 - Lugo-Pisgah No.2 220 kV Transmission Line
 - Cima-Eldorado-Pisgah No.1 220 kV Transmission Line
 - Cima-Eldorado-Pisgah No.2 220 kV Transmission Line
- Substations/Switchyard:
 - Cima 220/16 kV Substation
 - Eldorado 500/220 kV Substation
 - Lugo 500/220 kV Substation
 - Pisgah 220 kV Switchyard

The transmission line work included in the EPL Project has been divided into segments of the Cima-Eldorado-Pisgah No. 1 & 2 220 kV lines and the Lugo-Pisgah No. 1 and 2 220 kV lines.⁴ The EPL Project would include the following work on transmission lines and supporting structures:

- Cima-Eldorado-Pisgah No. 1 & 2 220 kV lines:
 - Reconductor approximately 107 circuit miles
 - Replace existing OHGW in all reconducted spans
 - Replace existing hardware and insulator assemblies with new hardware and shorter insulator assemblies on structures along portions of the lines
- Lugo-Pisgah No. 1 & 2 220 kV lines:
 - Reconductor approximately 14 circuit miles
 - Replace existing OHGW in all reconducted spans
 - Replace existing hardware and insulator assemblies with new hardware and shorter insulator assemblies on structures along portions of the lines
 - Install (12) inter-set transmission structures

The EPL Project represents only the remediation of discrepancies along *existing* transmission lines; the new conductor and structures to be installed will continue to be part of the existing system and do not represent an addition to the existing system.

The EPL Project would include the following substation- and switchyard-related work:

⁴

- Segment 1 spans approximately 67 miles from the existing Lugo Substation to the existing Pisgah Switchyard;
- Segment 2 spans approximately 66 miles from the existing Lugo Substation to the existing Pisgah Switchyard;
- Segment 3 spans approximately 82 miles from the existing Pisgah Switchyard to the California-Nevada stateline;
- Segment 4 spans approximately 83 miles from the existing Pisgah Switchyard to the California-Nevada stateline;
- Segment 5 spans approximately 27 miles from the California-Nevada stateline to the existing Eldorado Substation; and
- Segment 6 spans approximately 27 miles from the California-Nevada stateline to the existing Eldorado Substation.

- Disconnect existing conductor from existing positions at the existing Pisgah Switchyard and Cima Substation and connect newly installed conductors to existing substation positions.
- Remove existing OHGW and install new OHGW at the existing Pisgah Switchyard and Cima Substation. Make minor modifications to the existing terminal racks to accommodate the new OHGW.
- Update, as necessary, relay settings at the existing Lugo, Cima, and Eldorado substations and at the existing Pisgah Switchyard.

Please refer to PEA Chapter 3 for a detailed description of the EPL Project.

The estimated cost of the EPL Project is approximately \$245 million in 2025 constant dollars.⁵ The PEA prepared for the EPL Project, which discusses several alternatives to accomplish the EPL Project’s objectives (including a “No Project” alternative), is attached to the Original Application. The PEA will be referenced in this Amended Application, where appropriate, as the source of information required in an application for a PTC⁶ pursuant to G.O. 131-E, Section VII.B. A summary of the EPL Project’s purpose, need, and objectives is located in Chapter 2 of the PEA. A complete description of the EPL Project is located in Chapter 3 of the PEA.

Construction of the EPL Project is scheduled to begin in 4th quarter 2027 and scheduled to be completed by 1st quarter 2030. A schedule for the EPL Project is included in this Amended Application as APPENDIX A.

SCE requests that the Commission, upon completion of its review of this Amended Application, issue and certify an appropriate environmental document and issue a PTC

⁵ SCE has provided an updated cost estimate for the EPL Project as part of this Amended Application. Please note that the changes to the cost estimate are not a result of any changes to the EPL Project description, scope or components. As stated above, SCE is not proposing any change to the substance of the EPL Project from what was included in the Original Application. The revised cost estimate is a conceptual, prepared in advance of final engineering and prior to CPUC approval. Pension and benefits, administrative and general expenses, and allowance for funds during construction are not included in these estimates.

⁶ Other required information for a PTC application (*e.g.* Balance Sheet, Articles of Incorporation, *etc.*) is contained in this Application and its appendices or the appendices to the Original Application.

authorizing SCE to construct the EPL Project as set forth in this Amended Application and the previously-submitted PEA within the timelines set forth in Section VI, below.

VI.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory Authority

This Amended Application is made pursuant to the provisions of CEQA, G.O. 131-E, the CPUC Rules, and orders and resolutions of the Commission.

B. Applicant Description, Correspondence and Communication (CPUC Rule 2.1(a) and (b))

The applicant is SCE, an investor-owned public utility engaged in the business of generating, transmitting, and distributing electric energy in portions of Central and Southern California. SCE's properties, which are located primarily within the State of California, consist mainly of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business. In conducting such business, SCE operates an interconnected and integrated electric utility system.

SCE is organized and existing under the laws of the State of California. SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. Please address correspondence or communications in regard to this Amended Application to:

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C. Proceeding Category, Need for Hearings, and Schedule (CPUC Rule 2.1(c))

In compliance with CPUC Rule 2.1(c), SCE is required to state in this Application “[t]he proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” SCE proposes to categorize this Amended Application as a ratesetting proceeding. SCE anticipates that a hearing will not be necessary. This proceeding involves the Commission’s (i) environmental review of the EPL Project in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.) and G.O. 131-E; and (2) issuance of a PTC authorizing SCE to construct the EPL Project.

SCE suggests the following proposed schedule for this Amended Application:

Date	Action
September 2025	Amended Application Filed
October 2025	Amended Application Deemed Complete
February 2026	Draft CEQA Document Issued
September 2026	Final CEQA Document Issued
January 2027	Proposed Decision Issued
March 2027	Final Decision

D. Articles of Incorporation (CPUC Rule 2.2)

Pursuant to Rule 2.2 of the Commission’s Rules of Practice and Procedure, a copy of SCE’s Certificate of Amended and Restated Articles of Incorporation, effective on August 28, 2023, and presently in effect, certified by the California Secretary of State, was filed with the

Commission on December 15, 2023, in connection with Application No. A.23-12-011, and is incorporated herein by this reference. A statement of SCE's corporate information is attached hereto as APPENDIX E.

A copy of SCE's Certificate of Determination of Preferences of the Series M Preference Stock filed with the California Secretary of State on November 17, 2023, and presently in effect, certified by the California Secretary of State, was filed with the Commission on December 15, 2023, in connection with Application No. A.23-12-011, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series N Preference Stock filed with the California Secretary of State on May 8, 2024, and presently in effect, certified by the California Secretary of State, was filed with the Commission on May 15, 2024, in connection with Application No. A.24-05-007, and is incorporated herein by this reference.

Copies of SCE's latest Annual Report to Shareholders and Edison International's latest proxy statement was sent to its stockholders and has been sent to the Commission with an Energy Division Central Files Document Coversheet dated April 15, 2025, pursuant to General Order Nos. 65-A and 104-A of the Commission.

E. Financial Balance Sheet and Statement of Income (CPUC Rule 2.3)

Pursuant to CPUC Rule 2.3, SCE's most recently available balance sheet and income statement are attached hereto as APPENDIX F.

F. Service Territory

SCE's service territory is located in 15 counties in central and southern California, consisting of Fresno, Imperial, Inyo, Kern, Kings, Los Angeles, Madera, Mono, Orange, Riverside, Santa Barbara, San Bernardino, Tulare, Tuolumne,⁷ and Ventura Counties, and includes approximately 201 incorporated communities as well as outlying rural territories. A list of the counties and municipalities served by SCE is attached to SCE's Original Application as

⁷ SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

APPENDIX G. SCE also supplies electricity to certain customers for resale under tariffs filed with the Federal Energy Regulatory Commission.

G. Location of Items Required in Permit to Construct Pursuant to G.O. 131-E Section VII.B

Much of the information required to be included in a PTC application pursuant to G.O. 131-E, Section VII.B is found in the PEA filed with the Original Application.

Required PTC application information has been cross-referenced to the PEA in the following text. The PTC application requirements of G.O. 131-E, Section VII.B are in ***bold italics***, and the PEA references follow in bulleted plain text.

1. **A description of the proposed power line or substation or switchyard facilities, including the proposed power line route; proposed power line equipment, such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc., and a proposed schedule for authorization, construction, and commencement of operation of the facilities.**

A detailed description of the EPL Project and alternatives considered is included throughout the PEA, including in the PEA Executive Summary, Chapter 2, and Chapter 3, satisfying G.O. 131-E Section VII.B.2.a. Alternatives to the EPL Project are discussed in PEA Chapter 4, but no route alternatives or route variations were identified given that the deficiencies identified for remediation, which are the purpose of the EPL Project, are fixed in space along the existing transmission route.

Descriptions of the EPL Project alignment, referring to the locations where work generally would be done, are described in the PEA in Section 3 (“EPL Project Description”) and all subsections contained therein, and illustrated in figures and figure sets 3.1-1 (“Project Overview by Segments”).

The physical characteristics of the equipment proposed to be included in the EPL Project are described in the PEA in Chapter 3, particularly in Section 3.3 (“Project Components”) and all

subsections contained therein, and illustrated in figures and figure sets 3.5-1 (“Staging Areas”) and 3.5-2 (“Typical Pull-and-Tension/Stringing Site Setup”). The physical characteristics of alternatives to the EPL Project are described in Chapter 4 of the PEA.

The EPL Project Schedule discussed in PEA Section 3.6.4 (“Construction Schedule”) is outdated. An updated construction schedule is attached to this Amended Application as

APPENDIX A.

2. A map of the proposed power line routing or substation or switchyard location showing populated areas, parks, recreational areas, scenic areas, and existing electrical transmission or power lines within 300 feet of the proposed route or substation or switchyard.

Satisfying G.O. 131-E Section VII.B.2.b, maps of the regional and local Project setting are included in the PEA as figures and figure sets 3.1-1a, 2.1-1b, 3.1-1b, 3.5- 1, 5.4-1, 5.1-1, 5.1-2, 5.1-4, 5.1-4a, 5.1-4a-1, 5.1-4a-2, 5.1-4a-3, 5.1-4a-4, 5.1-4a-5, 5.1-4a-6, 5.1-4a-7, 5.1-4a-8, 5.1-4a-9, 5.1-4a-10, 5.1-4a-11, 5.1-4a-12, 5.1-4a-13, -14, -15, -16, 5.11-1, 5.16-1, and 5.19-1.

3. Reasons for adoption of the power line route or substation or switchyard location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each.

Satisfying G.O. 131-E Section VII.B.2.c, the reasons for the adoption of the selected transmission route and comparison to alternatives considered can be found in Chapter 4 of the PEA. Because the EPL Project involves the reconductoring of portions of existing transmission lines rather than the construction of new transmission lines, project planning did not involve the adoption of any new transmission routes.

4. **A listing of the governmental agencies, including Tribal governments, with which proposed power line route or substation or switchyard location reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.**

Satisfying G.O. 131-E Section VII.B.2.d, SCE reviewed the EPL Project with the following governmental agencies:

- CPUC: SCE has provided updates to the CPUC Energy Division staff on the EPL Project on a regular basis since 2016.
- Bureau of Land Management ("BLM"): SCE has met with representatives of the BLM regarding the EPL Project on a regular basis since 2017.
- National Park Service ("NPS"): SCE has met with representatives of the NPS regarding the EPL Project on a regular basis since 2017.
- San Bernadino County: SCE has met with representatives of San Bernardino County regarding the EPL Project on a regular basis since 2019. The county has not communicated any issues or concerns with the project as proposed.
- City of Hesperia: SCE Local Public Affairs staff communicated with the City of Hesperia regarding the EPL Project in 2022. The city has not communicated any issues or concerns with the project as proposed.
- Clark County: SCE Local Public Affairs staff communicated with Clark County regarding the EPL Project in 2021. The county has not communicated any issues or concerns with the project as proposed.
- City of Boulder City: SCE Local Public Affairs staff communicated with the City of Boulder City regarding the EPL Project in 2021. The county has not communicated any issues or concerns with the project as proposed.
- Native American Heritage Commission ("NAHC"): SCE has informed the NAHC regarding the EPL Project.

5. A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rules of Practice and Procedure Rule 2.4 and 2.5. If a PEA is filed, it may include the data described in Items a. through d. above

SCE submitted a PEA with the Original Application in April 2023. A copy of the PEA is available at: https://ia.cpuc.ca.gov/environment/info/panoramaenv/EPL_TLRR/index.html. As stated above, the changes associated with this application do not relate to the physical scope of the EPL Project and therefore do not require changes to the PEA.

6. EMF Discussion (G.O. 131-E, Section VII.B.2.e)

G.O. 131-E, Section VII.B.2.e, requires applications for a PTC to describe measures proposed by the utility to reduce potential exposure to electric and magnetic fields ("EMF") generated by the proposed facilities. A complete description of EMF-related issues is contained in SCE's Field Management Plan for the EPL Project, included as part of the CPCN Application as APPENDIX B. Based on the evaluation of the EPL Project's proposed route and configuration, SCE will apply no-cost magnetic field reduction measures documented in the Field Management Plan according to the CPUC EMF Policy.

7. Compliance with Other Applicable Commission Policies (G.O. 131-E, Section VII.B.2.f)

G.O. 131-E, Section VII.B.2.f, requires applications for a PTC to demonstrate compliance with other applicable Commission policies (e.g., the Environmental and Social Justice ("ESJ") Action Plan). The EPL Project would benefit all of SCE's customers, including ESJ communities, by repairing existing infrastructure to maintain system reliability. These repairs would improve service reliability and would mitigate safety risks associated with physical clearance discrepancies. Among other things, these repairs would also directly support attainment of Goals 4 and 6 of the Commission's ESJ Action Plan. Goal 4 of the ESJ Action Plan focuses on increasing climate resilience in ESJ communities. The EPL Project would support ESJ Action Plan Goal 4 by eliminating existing discrepancies, thereby improving system

reliability and climate resilience. Goal 6 of the ESJ Action Plan focuses on the safety of ESJ communities by ensuring utility compliance with CPUC regulations. The EPL Project would support ESJ Action Plan Goal 6 by ensuring compliance with CPUC G.O. 95 standards which contribute to the safe and reliable operation of the electric system.

H. Public Notice (G.O. 131-E, Section VIII.A)

Public notice of the CPCN Application was provided pursuant to G.O. 131-D at the time the Original Application was filed. Noticing requirements for a CPCN/PTC are described in G.O. 131-E, Section VIII.A. These noticing requirements were satisfied by SCE's prior notice, described in the Original Application. A copy of the Notice of Application for a Certificate of Public Convenience and Necessity and list of newspapers which published the original notice are contained in the Original Application as APPENDIX C. A copy of the Certificate of Service of Notice of Application for a Certificate of Public Convenience and Necessity and a service list are contained in the Original Application as APPENDIX D.

I. Compliance with Rule 2.5

Rule 2.5 of the Commission's Rules of Practice and Procedure provides that an applicant include a deposit to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report when the Commission is acting as the lead agency pursuant to CEQA. In accordance with Rule 2.5, SCE has already submitted the required deposit to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report for the revised EPL Project. The deposit was made on April 21, 2023.

J. Request for Ex Parte Relief

SCE requests that the relief requested in this Amended Application be provided ex parte.

K. Request for Timely Relief

SCE requests the Commission issue a decision within the time limits of the schedule proposed by SCE in this Amended Application.

VII.

CONCLUSION

Upon completion of its review of this Amended Application, SCE requests the Commission issue and certify an appropriate environmental document and issue a PTC authorizing SCE to construct the EPL Project set forth in this Amended Application and PEA.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Orville O. Cocking

By: Orville O. Cocking
Senior Vice President Transmission and Distribution

/s/ Lauren P. Goschke

By: Lauren P. Goschke

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

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Telephone: (626) 302-4906
Facsimile: (626) 302-1910
E-mail: Lauren.P.Goschke@sce.com

September 5, 2025

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **4th day of September, 2025**, at Pomona, California.

/s/ Orville O. Cocking

By: Orville O. Cocking
Senior Vice President Transmission and Distribution
SOUTHERN CALIFORNIA EDISON COMPANY

Appendix A
Project Schedule (Updated)

Proposed Eldorado-Pisgah-Lugo 220kV Project Schedule

Date	Event
September 2025	Amended Application Filed
October 2025	Application Deemed Complete
February 2026	Draft CEQA Document Issued
September 2026	Final CEQA Document Issued
January 2027	Proposed Decision Issued
March 2027	Final Decision Issued
December 2027	Commence Construction
January 2030	Commence Operation

Appendix E

Corporate Information and Articles of Incorporation (Updated)

CORPORATE INFORMATION

SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat and power in portions of central and southern California as a public utility subject to the jurisdiction of the California Public Utilities Commission. SCE's properties, which are located primarily within the State of California, consist mainly of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California, and its post office address and telephone number are:

Southern California Edison Company
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1212

A copy of SCE's Certificate of Amended and Restated Articles of Incorporation, effective on August 28, 2023, and presently in effect, certified by the California Secretary of State, was filed with the Commission on December 15, 2023, in connection with Application No. A.23-12-011, and is incorporated herein by this reference pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series M Preference Stock filed with the California Secretary of State on November 17, 2023, and presently in effect, certified by the California Secretary of State, was filed with the Commission on December 15, 2023, in connection with Application No. A.23-12-011, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series N Preference Stock filed with the California Secretary of State on May 8, 2024, and presently in effect, certified by the California Secretary of State, was filed with the Commission on May 15, 2024, in connection with Application No. A.24-05-007, and is incorporated herein by this reference.

Copies of SCE's latest Annual Report to Shareholders and Edison International's latest proxy statement was sent to its stockholders and has been sent to the Commission with an Energy Division Central Files Document Coversheet dated April 15, 2025, pursuant to General Order Nos. 65-A and 104-A of the Commission.

Appendix F

Balance Sheet and Statement of Income as of June 30, 2025 (Updated)

SOUTHERN CALIFORNIA EDISON COMPANY

(h) A balance sheet as of the latest available date, together with an income statement covering the period from close of last year for which an annual report has been filed with the Commission to the date of the balance sheet attached to the application.

STATEMENT OF INCOME
SIX MONTHS ENDED JUNE 30, 2025

(In millions)

OPERATING REVENUE	<u>\$ 8,334</u>
OPERATING EXPENSES:	
Purchase power and fuel	2,204
Operation and maintenance	2,515
Wildfire-related claims, net (recoveries)	(1,355)
Wildfire insurance fund expense	72
Depreciation and amortization	1,566
Property and other taxes	332
Other	<u>8</u>
Total operating expenses	<u>5,342</u>
OPERATING INCOME	2,992
Interest expense	(641)
Other income, net	<u>228</u>
INCOME BEFORE TAXES	2,579
Income tax expense	<u>502</u>
NET INCOME	2,077
Less: Preference stock dividend requirements	<u>67</u>
NET INCOME AVAILABLE FOR COMMON STOCK	<u><u>\$ 2,010</u></u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET
JUNE 30, 2025
ASSETS
(in millions)

UTILITY PLANT:

Utility plant, at original cost	\$ 69,468
Less- accumulated provision for depreciation and amortization	14,587
	<u>54,881</u>
Construction work in progress	5,788
Nuclear fuel - at amortized cost	128
	<u>60,797</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated depreciation of \$107	194
Nuclear decommissioning trusts	4,324
Other investments	53
	<u>4,571</u>

CURRENT ASSETS:

Cash and equivalents	77
Receivables, less allowances of \$310 for uncollectible accounts	1,899
Accrued unbilled revenue	925
Inventory	523
Prepaid expenses	95
Regulatory assets	2,805
Wildfire insurance fund contributions	138
Other current assets	417
	<u>6,879</u>

DEFERRED CHARGES:

Receivables, less allowance of \$47 for uncollectible accounts	61
Regulatory assets (Includes \$1,488 related to VIEs)	10,487
Wildfire insurance fund contributions	1,809
Operating lease right-of-use assets	1,150
Long-term insurance receivables	98
Long-term insurance receivables due from affiliate	282
Other long-term assets	2,510
	<u>16,397</u>
	<u>\$ 88,644</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET
JUNE 30, 2025
CAPITALIZATION AND LIABILITIES
(in millions)

CAPITALIZATION:

Common stock	2,168
Additional paid-in capital	8,943
Accumulated other comprehensive loss	(8)
Retained earnings	9,072
Common shareholder's equity	<u>20,175</u>
Long-term debt (Includes \$1,444 related to VIEs)	30,159
Preferred stock	<u>2,220</u>
Total capitalization	<u>52,554</u>

CURRENT LIABILITIES:

Short-term debt	455
Current portion of long-term debt	2,299
Accounts payable	1,970
Wildfire-related claims	169
Accrued interest	473
Regulatory liabilities	490
Current portion of operating lease liabilities	118
Other current liabilities	1,869
	<u>7,843</u>

DEFERRED CREDITS:

Deferred income taxes and credits	9,451
Pensions and benefits	85
Asset retirement obligations	2,549
Regulatory liabilities	11,066
Operating lease liabilities	1,032
Wildfire-related claims	568
Other deferred credits and other long-term liabilities	3,496
	<u>28,247</u>

\$ 88,644

Appendix H

***Amendments to the Application of Southern California Edison (U 338-E) For A
Certificate of Public Convenience and Necessity to Construct Electrical Facilities With
Voltages Between 50kV And 200 kV: Eldorado-Pisgah-Lugo Transmission Line Rating
Remediation Project, filed April 21, 2023 (New)***

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for a ~~Certificate of Public Convenience and Necessity~~ Permit to Construct Electrical Facilities ~~With~~ with Voltages Over 200 kV: Eldorado-Pisgah-Lugo Transmission Line Rating Remediation Project.

Application 23-04-~~XXX~~ 009

**AMENDED APPLICATION OF SOUTHERN CALIFORNIA
EDISON COMPANY
(U 338-E) FOR A ~~CERTIFICATE OF PUBLIC CONVENIENCE AND
NECESSITY~~ PERMIT TO CONSTRUCT ~~ELECTRIC FACILITIES WITH VOLTAGES
OVER
200 KV: ELDORADO-PISGAH-LUGO~~
FOR THE ELDORADO-PISGAH-LUGO TRANSMISSION LINE
RATING REMEDIATION PROJECT**

ROBERT PONTELLE
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E-mail: Lauren.P.Goschke@sce.com

Dated: ~~April 21~~ September 5, 2023 2025

~~APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO
CONSTRUCT ELECTRIC FACILITIES WITH VOLTAGES OVER 200 KV: ELDORADO-
PISGAH-LUGO TRANSMISSION LINE RATING REMEDIATION~~

Amended Application of Southern California Edison Company
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Amended Application of Southern California Edison Company
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<p>74. A listing of the governmental agencies, <u>including Tribal governments</u>, with which proposed <u>power line</u> route review<u>or substation or switchyard location reviews</u> have been undertaken, including a written agency response to applicant's written request for a brief position<u>psition</u> statement by that agency. <i>(Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.)</i> In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.</p>	<p>19<u>16</u></p>
<p>85. A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rules of Practice and Procedure, Rule 2.43<u>2.4 and 2.5</u>. If a PEA is filed, it may include the data described in Items <u>a</u> through <u>g</u>d, above:</p>	<p>20<u>17</u></p>
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~~APPENDIX B—EPL PROJECT FIELD MANAGEMENT PLAN~~

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FOR EPL PROJECT~~

Appendix E—: Corporate Information and Articles of Incorporation
(updated)

Appendix F—: Balance Sheet and ~~INCOME~~ Statement ~~FOR~~of Income
as of
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Appendix H: Amendments to the Application of Southern California
Edison (U 338-E) For A Certificate of Public
Convenience and Necessity to Construct Electrical
Facilities With Voltages Between 50kV And 200 kV:
Eldorado-Pisgah-Lugo Transmission Line Rating
Remediation Project, filed April 21, 2023 (new)

~~APPENDIX G—LIST OF COUNTIES AND MUNICIPALITIES SERVED
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~~APPENDIX H—ANNUAL REVENUE REQUIREMENT~~

~~APPENDIX I—ESTIMATED EPL PROJECT COSTS~~

~~APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
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In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for a ~~Certificate of Public Convenience and Necessity~~ Permit to Construct Electrical Facilities ~~With~~ with Voltages Over 200 kV: Eldorado-Pisgah-Lugo Transmission Line Rating Remediation Project.

Application 23-04-~~XXX~~-009

**AMENDED APPLICATION OF SOUTHERN CALIFORNIA
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200 KV: ELDORADO-PISGAH-LUGO~~
FOR THE ELDORADO-PISGAH-LUGO TRANSMISSION LINE
RATING REMEDIATION ~~PROJECT~~ PROJECT**

I.

INTRODUCTION

~~Pursuant to Sections 1001, 1003.5, and 1004 et seq. of the California Public Utilities Code, the California Environmental Quality Act (“CEQA”) (Public Resources Code § 21000 et seq.), the~~ Pursuant to California Public Utilities ~~Commission’s~~ Commission (“Commission” or “CPUC”) ~~General Order (“G.O.”) 131-D, and the Commission’s Rules~~ Rule of Practice and

Procedure (~~“CPUC Rules”~~), 1.12¹ Southern California Edison Company (“SCE”) ~~requests a Certificate of Public Convenience and Necessity (“CPCN”) to permit SCE to construct~~ hereby submits this amended application (“Amended Application”) for a Permit to Construct (“PTC”) the Eldorado-Pisgah-Lugo (“EPL”) Transmission Line Rating Remediation (“TLRR”) Project (~~collectively,~~ “EPL Project” or “Proposed Project”).

The purpose of the EPL Project is to remediate physical clearance discrepancies identified on some of SCE’s existing 220 kilovolt (“kV”) transmission lines while continuing to provide safe and reliable electric service. ~~SCE has prepared a Proponent’s Environmental Assessment (“PEA”) that analyzes the EPL Project scope. The PEA is submitted concurrently with this Application.~~ In order to reflect the relief SCE seeks in this Amended Application, the caption of the proceeding has been revised to indicate that this Amended Application seeks a PTC rather than a Certificate of Public Convenience and Necessity (“CPCN”).

II.

~~PROJECT SCOPE AND BACKGROUND AND SUMMARY OF REQUEST~~

~~A. Project Need~~

The EPL Project is ~~needed~~ designed to bring portions of existing transmission lines into compliance with physical clearance standards while maintaining the existing line ~~ratings~~ rating for the affected circuits, and to ensure that SCE is able to continue to provide safe and reliable ~~electrical~~ electric service.

The EPL Project proposes to address portions of transmission lines in both California and Nevada. With respect to the California portion, CPUC General Order 95 (“G.O. 95”) Rules 37 through 39 specify minimum vertical and horizontal clearances to be maintained between an electrical conductor and other conductors, or between a conductor and the ground, buildings, and a variety of other objects. The design of electric lines in Nevada is governed by the standards

¹ Rule 1.12(a) states that amendments to applications should be filed prior to the issuance of a scoping memo.

contained in Section 23 of the National Electrical Safety Code (“NESC”), which provides vertical and horizontal clearances applicable in Nevada.

In 2006, SCE identified discrepancies along many of its circuits where minimum clearances are not being met compared to G.O. 95 standards. In response, SCE established its TLRR Program. The TLRR Program is focused on developing and implementing engineering solutions for each identified discrepancy to bring the circuits into compliance with standards contained in G.O. 95 ~~and, thereby maintaining the line ratings reflected in~~ the California Independent System Operator (“CAISO”) ~~2008~~ Transmission Register. SCE is committed to undertaking all reasonable efforts to correct known discrepancies ~~on its bulk electric system facilities prior to December 31, 2025. All transmission lines that make up the EPL Project are a part of the bulk electric system as soon as practicable.~~

Pursuant to the TLRR Program, SCE identified G.O. 95 discrepancies along those portions of the following existing transmission line circuits located in unincorporated San Bernardino County and the City of Hesperia within the State of California, and NESC Section 23 discrepancies on those portions of these transmission line circuits located in unincorporated Clark County and the City of Boulder City within the State of Nevada:

- Lugo-Pisgah No.1 220 kV Transmission Line
- Lugo-Pisgah No.2 220 kV Transmission Line
- Cima-Eldorado-Pisgah No.1 220 kV Transmission Line
- Cima-Eldorado-Pisgah No.2 220 kV Transmission Line

The work needed to remediate the discrepancies on these specific circuits constitutes the scope of the EPL Project, and includes the installation of new conductor, Overhead Ground Wire (“OHGW”), inter-set structures, and the modification or replacement of hardware and insulators, all of which will be engineered and constructed to meet G.O. 95 (for portions of the circuits in California) and NESC Section 23 (for portions of the circuits in Nevada) standards. The EPL Project would also ~~make~~involve minor modifications at the Cima substation and Pisgah switchyard. The primary objective of the EPL Project is to remediate identified discrepancies and

bring the California portion of the EPL Project transmission lines into full compliance with the standards contained in G.O. 95 Rules 37 through Rule 39 and to bring the Nevada portion of the EPL Project transmission lines into full compliance with NESC Section 23 standards.^{±2}

Remediation of the discrepancies will also bring the lines into operational compliance with SCE's published facility rating methodology and compliance with applicable North American Reliability Corporation ("NERC") reliability standards. Realization of the primary objective will also meet a secondary objective of continuing to provide safe and reliable electrical service, as remediation of the identified discrepancies will address safety and reliability concerns related to the condition of existing infrastructure on the affected transmission lines. ~~Remediation of the discrepancies~~Discrepancy remediation will maintain overall reliability by replacing existing conductor and OHGW with new conductor and OHGW ~~and thus~~, reducing the reliability risks posed by the discrepancies.

SCE considered a variety of ways to construct the EPL Project. SCE believes the EPL Project proposed in this Amended Application represents the optimized design—it meets the identified objectives, is feasible to construct, and presents the least-intensive scope of work and the smallest physical footprint of any potential solutions identified by SCE. To avoid or reduce potential environmental impacts to the maximum feasible extent, most of the work under the EPL Project will be performed within an existing transmission line corridor, utilizing existing disturbed areas and access roads, thereby minimizing impacts to undisturbed sensitive environmental resources. The locations of the inter-set structures to be installed, and in some instances the orientation and configuration of construction work areas, were selected to avoid sensitive environmental resources and to avoid potential land use conflicts. In addition, the off-alignment staging yards have been preferentially sited on previously- or currently-disturbed areas, or in areas with degraded habitat where previously- or currently-disturbed areas are not

^{±2} As with all of SCE's TLRR Projects, the EPL Project is designed to meet ~~the EPL Project~~project needs while minimizing environmental impacts; providing safe and reliable electrical service; and conforming with industry and/or SCE's approved engineering, design, and construction standards for transmission and transmission system projects.

available. The EPL Project will therefore ~~serve the public convenience through both the achievement of both~~ achieve the project objectives ~~as well as by minimizing and minimize~~ potential environmental impacts to the greatest feasible extent. As discussed in Chapter 5 of the PEA Proponent's Environmental Assessment already submitted in this proceeding ("PEA," discussed further below), the EPL Project would not result in any potentially significant impacts under any CEQA impact category.

As discussed more fully in Chapter 4 of the PEA, even though the EPL Project would not result in any significant environmental impacts, SCE nevertheless identified and analyzed one feasible alternative to the EPL Project, the Partial Reconductor/Shorter Insulators Alternative, as well as a No Project Alternative. SCE also identified and analyzed several other alternatives to the EPL Project; these alternatives, and the criteria and rationale behind why each was rejected from further analysis, are presented in Chapter 4 of the PEA. Based on SCE's analysis of alternatives in the PEA, SCE has identified the EPL Project as its proposed project.

~~SCE requests that the Commission, upon completion of its review of this Application, issue and approve or certify an appropriate environmental document pursuant to CEQA, and issue a CPCN authorizing SCE to construct the EPL Project as set forth in this Application and the attached PEA within the timelines set forth in Section VI.D of this Application.~~

III.

PROCEDURAL HISTORY AND SUMMARY OF SCE'S REQUEST

~~During~~ On April 21, 2023, SCE filed an Application for a CPCN along with a PEA for the EPL Project ("CPCN Application" or "Original Application") under CPUC General Order 131-D ("G.O. 131-D"). In SCE's Original Application for the EPL Project, SCE explained that "[d]uring the development of the EPL Project, the California Legislature adopted Senate Bill ("SB") 529², providing relief from the requirements of a CPCN for the extension, expansion, upgrade, or other modification of an existing transmission line or substation, and directing the CPUC to revise G.O.

² ~~Bill Text—SB 529 Electricity: electrical transmission facilities.~~

131-D to provide for the processing of such projects through the Permit to Construct (“PTC”) application process. Should the Commission revise G.O. 131-D such that the EPL Project qualifies for a PTC during the pendency of this Application, SCE requests that the Commission convert this Application into a request for a PTC and process it accordingly.”³

SB 529 directed the CPUC to revise G.O. 131-D to allow projects over 200kV that would extend, expand, upgrade, or modify an existing electrical transmission facility to receive approval via a PTC or, if applicable, claim an exemption to the need for approval, even if the project would previously have required approval via a CPCN.

Pursuant to this directive, on May 18, 2023, the CPUC initiated a rulemaking proceeding (R. 23-05-018) to update G.O. 131-D to implement the requirements of SB 529 to streamline and clarify permitting requirements for electrical transmission facilities. The CPUC also made several other changes and updates to G.O. 131-D to streamline project permitting, approval, and construction processes, resulting in the replacement of G.O. 131-D with G.O. 131-E, effective January 30, 2025.

Relevant here, G.O. 131-E Section III.A.2 provides (*emphasis added*):

The following project types, even if involving a transmission line, do not require a CPCN. In lieu of filing an application to obtain a CPCN, utilities are authorized to file a permit to construct application or claim an exemption for these project types under Section III.B:

a. An extension, expansion, upgrade, or other modification to an electric public utility’s existing electrical transmission facilities, including electric transmission lines, substations, and switchyards within existing transmission easements, rights of way,

³ Application Of Southern California Edison Company (U 338-E) For A Certificate of Public Convenience and Necessity to Construct Electrical Facilities With Voltages Between 50kv And 200 kV: Eldorado-Pisgah-Lugo Transmission Line Rating Remediation Project, filed April 21, 2023, p. 5.

or franchise agreements, irrespective of whether the electrical transmission facility is above a 200 kV voltage level.

As a result of these changes to the permitting process in G.O. 131-E, and because, as described in more detail below, the work proposed under the EPL Project constitutes an “upgrade” to an “existing electrical transmission facility,” SCE requests that the Commission accept and approve this Amended Application seeking a PTC for the EPL Project.

G.O. 131-E Section 1.E defines an “existing electrical transmission facility” as a “transmission line, power line, substation, or switchyard that has been constructed for operation at or above 50 kV.” The circuits that make up the EPL Project are existing 220 kV transmission lines, and are thus within the definition of “existing electrical transmission facility.” G.O. 131-E Section 1.H defines an “upgrade” as the “replacement or alteration of existing electrical transmission facilities, or components thereof, to enhance the rating, voltage, capacity, capability, or quality of those facilities.” Section 1.H.1 describes that as an example, an upgrade would include work resulting in “[r]econductoring existing transmission or power lines to use conductors with greater power transfer capability and/or increased voltage levels, where the reconductoring requires replacement of the existing supporting structures.” The EPL Project would reconductor approximately 121 circuit miles of existing transmission lines to enhance the quality of the existing facilities. Additionally, the EPL Project would add 12 inter-set structures along the existing transmission line to support the reconductoring effort. The EPL Project scope therefore fits squarely within the G.O. 131-E definition of “upgrade.”

SCE requests that the Commission, upon completion of its review of this Amended Application, issue and approve or certify an appropriate environmental document pursuant to CEQA, and issue a PTC authorizing SCE to construct the EPL Project as set forth in this Amended Application and the PEA within the timelines set forth in Section VI of this Amended Application.

IV.

CHANGES REFLECTED IN THIS AMENDED APPLICATION

This Amended Application seeks a PTC, rather than a CPCN, for the EPL Project, consistent with G.O. 131-E. While the type of approval requested in this Application has changed, the scope of the EPL Project remains the same. Therefore, there are no changes to the PEA that was submitted with the Original Application. As such, SCE has not re-attached the PEA to this Amended Application.

In addition to the caption modification, certain amendments to the Original Application have been made to satisfy the requirements of a G.O. 131-E and update information that has changed since the Original Application was filed. SCE has prepared a redline showing the changes to the Original Application and has included it with this Amended Application as APPENDIX H with underlined text for additions and with strikethrough for text that has been deleted. None of these changes relate to the physical scope of the EPL Project, which remains as originally presented in the PEA's project description.

This Amended Application refers to several appendices included in the Original Application. Some of those appendices have been updated as part of this Amended Application, as noted below. The following appendices, along with the April 2023 PEA, are part of the Amended Application:

<u>APPENDIX A</u>	<u>Project Schedule (updated)</u>
<u>APPENDIX E</u>	<u>Corporate Information and Articles of Incorporation (updated)</u>
<u>APPENDIX F</u>	<u>Balance Sheet and Statement of Income as of June 30, 2025 (updated)</u>
<u>APPENDIX H</u>	<u>Amendments to the <i>Application Of Southern California Edison Company (U 338-E) For A Certificate of Public Convenience and Necessity to Construct Electrical Facilities With Voltages Between 50kV And 200 kV: Eldorado Pisgah-Lugo Transmission Line Rating Remediation Project</i>, filed April 21, 2023 (new)</u>

V.H.

PROJECT DESCRIPTION

The EPL Project work would impact (i) four existing transmission lines where discrepancies have been identified, and (ii) substations/switchyard connected to those transmission lines. The EPL Project's existing utility system comprises the following:

- Transmission Lines:
 - Lugo-Pisgah No.1 220 kV Transmission Line
 - Lugo-Pisgah No.2 220 kV Transmission Line
 - Cima-Eldorado-Pisgah No.1 220 kV Transmission Line
 - Cima-Eldorado-Pisgah No.2 220 kV Transmission Line
- Substations/Switchyard:
 - Cima 220/16 kV Substation
 - Eldorado 500/220 kV Substation
 - Lugo 500/220 kV Substation
 - Pisgah 220 kV Switchyard

The transmission line work included in the EPL Project has been divided into segments of the Cima-Eldorado-Pisgah No. 1 & 2 220 kV lines and the Lugo-Pisgah No. 1 and 2 220 kV lines.^{3,4} The EPL Project would include the following work on transmission lines and supporting structures:

- Cima-Eldorado-Pisgah No. 1 & 2 220 kV lines:
 - Reconductor approximately 107 circuit miles
 - Replace existing OHGW in all reconducted spans
 - Replace existing hardware and insulator assemblies with new hardware and shorter insulator assemblies on structures along portions of the lines
- Lugo-Pisgah No. 1 & 2 220 kV lines:
 - Reconductor approximately 14 circuit miles
 - Replace existing OHGW in all reconducted spans
 - Replace existing hardware and insulator assemblies with new hardware and shorter insulator assemblies on structures along portions of the lines
 - Install (12) inter-set transmission structures

The EPL Project represents only the remediation of discrepancies along *existing* transmission lines; the new conductor and structures to be installed will continue to be part of the existing system and do not represent an addition to the existing system.

The EPL Project would include the following substation- and switchyard-related work:

-
- ³ ⁴
- Segment 1 spans approximately 67 miles from the existing Lugo Substation to the existing Pisgah Switchyard;
 - Segment 2 spans approximately 66 miles from the existing Lugo Substation to the existing Pisgah Switchyard;
 - Segment 3 spans approximately 82 miles from the existing Pisgah Switchyard to the ~~California-Nevada~~ California- Nevada stateline;
 - Segment 4 spans approximately 83 miles from the existing Pisgah Switchyard to the ~~California-Nevada~~ California- Nevada stateline;
 - Segment 5 spans approximately 27 miles from the California-Nevada stateline to the existing Eldorado Substation; and
 - Segment 6 spans approximately 27 miles from the California-Nevada stateline to the existing Eldorado Substation.

- Disconnect existing conductor from existing positions at the existing Pisgah Switchyard and Cima Substation and connect newly installed conductors to existing substation positions.
- Remove existing OHGW and install new OHGW at the existing Pisgah Switchyard and Cima Substation. Make minor modifications to the existing terminal racks to accommodate the new OHGW.
- Update, as necessary, relay settings at the existing Lugo, Cima, and Eldorado substations and at the existing Pisgah Switchyard.

Please refer to PEA Chapter 3 for a detailed description of the EPL Project.

IV.

PROJECT COST INFORMATION

~~In compliance with Public Utilities Code § 1005.5(a),⁴SCE developed estimated costs associated with the EPL Project. SCE estimated the costs for the EPL Project's direct costs and contingency.⁵The following describes the estimated costs for the EPL Project broken down by cost type. All costs are provided in 2023 constant dollars, unless otherwise noted. As shown in the EPL Project cost tables included in Appendix I, the total estimated direct costs for the EPL Project are \$196 million in 2023 constant dollars. While the majority of the costs associated with the EPL Project are FERC-jurisdictional, SCE will seek to recover certain prudently incurred costs associated with the EPL Project through Commission-jurisdictional rates as may be warranted. Construction of the EPL Project is scheduled to begin in December 2025 with a proposed completion date of October 2027. A schedule for the EPL Project construction is included in this Application as part of the Project Plan at Appendix A.~~

~~⁴ Pub. Util. Code § 1005.5(a) provides that: "Whenever the commission issues to an electrical ... corporation a certificate authorizing the new construction of any addition to or extension of the corporation's plant estimated to cost greater than fifty million dollars (\$50,000,000), the commission shall specify in the certificate a maximum cost determined to be reasonable and prudent for the facility."~~

~~⁵ The total cost of the EPL Project, including contingency, is estimated at \$223 million in 2023 constant dollars.~~

A. Estimated Direct Costs of the EPL Project

The estimated ~~direct costs~~cost of the EPL Project ~~amount to~~is approximately \$~~196~~245 million in ~~2023~~2025 constant dollars ~~(\$198 million in nominal dollars). Estimated direct costs are based on applying unit costs to the scopes of work developed.~~⁵ The PEA prepared for the EPL Project for different project components including siting; environmental surveys; monitoring and mitigation; licensing; preliminary and final engineering; construction; labor; materials; real estate; and known risks., which discusses several alternatives to accomplish the EPL Project's objectives (including a "No Project" alternative), is attached to the Original Application. The PEA will be referenced in this Amended Application, where appropriate, as the source of information required in an application for a PTC⁶ pursuant to G.O. 131-E, Section VII.B. A summary of the EPL Project's purpose, need, and objectives is located in Chapter 2 of the PEA. A complete description of the EPL Project is located in Chapter 3 of the PEA.

Construction of the EPL Project is scheduled to begin in 4th quarter 2027 and scheduled to be completed by 1st quarter 2030. A schedule for the EPL Project is included in this Amended Application as APPENDIX A.

SCE requests that the Commission, upon completion of its review of this Amended Application, issue and certify an appropriate environmental document and issue a PTC authorizing SCE to construct the EPL Project as set forth in this Amended Application and the previously-submitted PEA within the timelines set forth in Section VI, below.

~~The scope of work used for these estimates is based on the preliminary project engineering, project description and environmental information described in the PEA, as~~

⁵ SCE has provided an updated cost estimate for the EPL Project as part of this Amended Application. Please note that the changes to the cost estimate are not a result of any changes to the EPL Project description, scope or components. As stated above, SCE is not proposing any change to the substance of the EPL Project from what was included in the Original Application. The revised cost estimate is a conceptual, prepared in advance of final engineering and prior to CPUC approval. Pension and benefits, administrative and general expenses, and allowance for funds during construction are not included in these estimates.

⁶ Other required information for a PTC application (e.g. Balance Sheet, Articles of Incorporation, etc.) is contained in this Application and its appendices or the appendices to the Original Application.

~~described in Section II and III of this Application. Labor costs include costs of construction personnel and various project support functions. Construction personnel are comprised of the many crews required to safely and effectively construct the EPL Project components. Project support personnel represent resources required to design, plan and support construction activities, including but not limited to engineering, project management, project controls, environmental monitoring, and permitting. Material and equipment costs include but are not limited to costs for materials needed to complete a partial reconductoring, replacement of OHGW in corresponding reconductor spans, the installation of 12 transmission inter set structures, and the installation of new insulator assemblies and insulator assembly related hardware on 79 existing lattice steel tower structures. Estimated real estate costs include all costs related to the expected modification of existing easements and rights of way, and the acquisition of new easements, rights of way, and temporary rights of way, construction easements, and temporary entry permits, on both private and public lands. Estimates of the expected direct costs by the primary components are listed in Appendix I.~~

B. SCE's Contingency Estimate

~~Cost estimates for a project of this complexity are subject to multiple uncertainties, especially where, as here, the estimates are based on preliminary scopes of work. As such, it is reasonable and prudent to assume a level of contingency to help mitigate the unknown risks and uncertainties given this early stage of project development.~~

~~“Contingency” is defined by the Association for the Advancement of Cost Engineering (“AACE⁶”) as “specific provision for unforeseeable elements of cost within the defined project scope.” In addition to AACE’s standards, SCE’s contingency standards are based on the professional judgment and experience of SCE’s engineering and construction professionals. This level of contingency does not necessarily mean that SCE will spend this full amount, but it~~

⁶ ~~Formerly known as the American Association of Cost Engineers (“AACE”); see AACE’s *Project and Cost Engineers’ Handbook*.~~

~~reflects that it is a reasonable estimate of what the maximum cost is forecast to be at the current conceptual level of design and planning. Based on SCE's experience, the EPL Project contingency is calculated as 15% on the remaining direct cost estimates.~~

~~SCE's contingency attempts to account for uncertainties related to the following:~~

- ~~• Unforeseeable elements of cost within the defined project scope;~~
- ~~• Material quantity variances within the defined scope;~~
- ~~• Minor material cost uncertainties;~~
- ~~• Labor hour variances within the defined scope;~~
- ~~• Minor labor cost uncertainties;~~
- ~~• Minor fluctuations in currency exchange rates;~~
- ~~• Reasonable outage scheduling risk; and~~
- ~~• Reasonable impacts from environmental restrictions (e.g., bird nesting).~~

~~Contingency estimates cannot reasonably provide for the following:~~

- ~~• Major project scope changes;~~
- ~~• Major schedule changes;~~
- ~~• Major price increases for material and labor;~~
- ~~• Significant regulatory approval delays;~~
- ~~• Subsurface conditions that are significantly different from presently available information;~~
- ~~• Unforeseeable environmental conditions and/or mitigation requirements, including, for example, significant nesting bird related delays;~~
- ~~• Delays related to real property right acquisition;~~
- ~~• Intervenor and/or property owner legal challenges leading to significant delay in land acquisition;~~
- ~~• Unavailability of skilled labor due to nationwide and worldwide demand, and/or strikes;~~
- ~~• Unavailability of materials and/or equipment due to nationwide and worldwide demand, late delivery or faulty materials;~~

- Contractor non-performance; and
- Force majeure events, property or casualty losses.

Including contingency in any finding of maximum prudent costs would be consistent with Commission precedent based on all prior CPCNs granted to SCE. Excluding contingency would not only contradict recent precedent and industry best practices, but it would be unrealistic to assume that there will not be variances in material quantities or labor hour estimates once the project engineering is finalized, future market pricing at the time of expenditures are known, and the environmental requirements are determined.

C. Summary of Estimated Costs for the EPL Project

The construction costs associated with the EPL Project's scope of work are broken down in the project cost table, Appendix I. The left side of the table lists the scope elements grouped by the following categories: licensing, project management during execution, transmission lines rated 220 kV or greater, substation/switchyard, real estate land acquisition and easements, environmental work and associated known risks.

The estimated direct costs are provided next to each element. The estimated contingency costs are then added to the total direct costs at the bottom of the project cost table. As noted in Appendix I, the direct cost estimates are represented in 2023 constant dollars. Including contingency, the total EPL Project construction costs are estimated to be \$223 million in 2023 constant dollars.

Consistent with recent CPCNs, corporate overheads and financing costs during the project development and execution phases and, once in-service, operation and maintenance ("O&M") costs, should not be included in a CPCN's maximum cost.

**PUBLIC UTILITIES CODE 1005 AND ADJUSTMENT OF THE MAXIMUM
REASONABLE AND PRUDENT COST ESTIMATE**

~~In D.07-01-040, the Commission recognized that the FERC will ultimately decide how much of the costs the utility may reflect in transmission rates.⁷ However, SCE recognizes that Public Utilities Code Section 1005.5(a) directs the Commission to specify “a maximum cost determined to be reasonable and prudent for the facility.”⁸~~

~~The Commission has recognized that the costs submitted in a CPCN application are based on conceptual or preliminary design estimates, and assuming the CPCN is granted, the cost estimates subsequently will be adjusted based on the route selected by the Commission, the final engineering design, final environmental mitigation requirements, and many other factors.~~

~~Public Utilities Code Section 1005.5(b) specifically allows the utility applicant to seek to increase the maximum cost after the decision granting the CPCN has been issued, if the utility determines that the cost, in fact, has increased.⁹ Any future adjustments would be based on changes in cost estimates, once SCE completes final, detailed design-based construction estimates, necessary to reflect items such as:~~

⁷ See D.07-01-040 (“DPV2”) mimeo., p. 45. (“While FERC will ultimately decide how much of the costs for this project SCE may recoup in transmission rates, we have jurisdiction pursuant to Pub. Util. Code § 1005.5(a) and the responsibility to specify in the CPCN a “maximum cost determined to be reasonable and prudent for the DPV2 project.”).

⁸ Pub. Util. Code § 1005.5(a) provides that: “Whenever the commission issues to an electrical . . . corporation a certificate authorizing the new construction of any addition to or extension of the corporation's plant estimated to cost greater than fifty million dollars (\$50,000,000), the commission shall specify in the certificate a maximum cost determined to be reasonable and prudent for the facility.” In specifying the maximum costs at which the project is within the public’s convenience and necessity, the Commission is not setting a limit for actual spending or cost recover, as to do so would be outside the CPUC’s authority and jurisdiction.

⁹ As set forth in Pub. Util. Code § 1005.5(b): “After the certificate has been issued, the corporation may apply to the commission for an increase in the maximum cost specified in the certificate. The Commission may authorize an increase in the specified maximum cost, if it finds and determines that the cost has in fact increased and that the present or future public convenience and necessity require construction of the project at the increased cost; otherwise, it shall deny the application.” (Pub. Util. Code § 1005.5(b).).

- ~~1. Adjustments in Project costs because of any unanticipated delays in starting the project or inflation;~~
- ~~2. Adjustments in Project costs as a result of final design criteria;~~
- ~~3. Additional Project costs resulting from the adopted mitigation measures (and mitigation monitoring program); and~~
- ~~4. Events related to equipment and raw materials, for example, the price of steel, concrete, other raw materials, and equipment that, in fact, increase the cost of the project.~~

~~For all the above reasons, SCE suggests that the Commission should adopt a maximum reasonable and prudent cost estimate based on the numbers and scope presented in this filing and authorize SCE to seek adjustments to the estimate through the advice letter process if the cost increases in the future.~~

A. Eligibility for 399.2.5 Recovery

~~Similar to previous Commission decisions, specifically, D.07-03-012, D.07-03-045, and D.09-12-044, SCE requests that the Commission explicitly establish that, pursuant to Pub. Util. Code § 399.2.5, SCE can recover through CPUC jurisdictional rates all costs associated with the EPL Project prudently incurred by SCE that the FERC does not allow SCE to recover in its general transmission rates.¹⁰~~

VI.

STATUTORY AND PROCEDURAL REQUIREMENTS

~~The Public Utilities Code, CPUC Rules, and G.O. 131-D require various items to be submitted with CPCN applications:~~

¹⁰ ~~Such costs could include SCE's Transmission Revenue Requirement (TRR) and CAISO's Transmission Access Charge (TAC).~~

A. Statutory Authority

This Amended Application is made pursuant to the provisions of CEQA, G.O. 131-~~D~~, ~~Public Utility Code Sections 1001, 1003.5 and 1004~~E, the CPUC Rules, and orders and resolutions of the Commission.

B. Applicant Description, Correspondence and Communication (CPUC Rule 2.1(a) and (b))

The applicant is SCE, an investor-owned public utility engaged in the business of generating, transmitting, and distributing electric energy in portions of Central and Southern California. SCE's properties, which are located primarily within the State of California, consist mainly of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business. In conducting such business, SCE operates an interconnected and integrated electric utility system.

SCE is organized and existing under the laws of the State of California. SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. Please address correspondence or communications in regard to this Amended Application to:

Lauren Goschke
Senior Attorney
Southern California Edison Company
Post Office Box 800
Rosemead, California 91770
Phone: (626) 302-4906
Email: Lauren.P.Goschke@sce.com

With a copy to:

Case Administration
Southern California Edison Company
8631 Rush St.
Rosemead, California 91770
Phone: (626) 302-6906
Fax: (626) 302-5060
Email: case.admin@sce.com

C. Proceeding Category, Need for Hearings, and Schedule (CPUC Rule 2.1(c))

In compliance with CPUC Rule 2.1(c), SCE is required to state in this Application “[t]he proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” SCE proposes to categorize this Amended Application as a ratesetting proceeding. SCE anticipates that a hearing will not be necessary. This proceeding involves the Commission’s (i) environmental review of the EPL Project in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.) and ~~the~~ G.O. 131-DE; and (2) issuance of a ~~EPCN~~PTC authorizing SCE to construct the EPL Project.

SCE suggests the following proposed schedule for this Amended Application:-:

Date	Action
April 21, 2023 <u>September 2025</u>	<u>Amended</u> Application/ PEA Submitted <u>Filed</u>
May 1, 2023 (within 10 days of filing)	Notice of Filing of the Application by direct mail, advertisement, and posting complete Deliver copies of the Notice to the CPUC Public Advisor and Energy Division
May 22, 2023 <u>October 2025</u>	Protest Period Ends CPUC Finds <u>Amended</u> Application <u>Deemed</u> Complete
June 1, 2023 <u>February 2026</u>	Replies to Protests Filed (10 days after protests filed) <u>Draft CEQA Document</u> <u>Issued</u>

August 2024 <u>September 2026</u>	Prehearing Conference <u>Final CEQA</u> <u>Document Issued</u>
August 2024	Scoping Memo
September 2024	Concurrent Opening Testimony
September 2024	Concurrent Rebuttal Testimony
October 2024	Concurrent Opening Briefs Due
November 2024	Concurrent Reply Briefs Due
January 2025 <u>2027</u>	Proposed Decision Issued
February 2025	Comments on Proposed Decision Due
February 2025	Reply Comments on Proposed Decision Due
March 2025 <u>2027</u>	Commission <u>Final</u> Decision

D. Articles of Incorporation (CPUC Rule 2.2; ~~Public Utilities Code § 1004~~)

Pursuant to ~~CPUC~~ Rule 2.2 ~~and Public Utilities Code Section 1004~~ of the Commission's Rules of Practice and Procedure, a copy of SCE's Certificate of Amended and Restated Articles of Incorporation, ~~as~~-effective on ~~March 2~~ August 28, 2006 2023, and ~~as~~-presently in effect, certified by the California Secretary of State, was filed with the Commission on ~~March 14~~ December 15, 2006 2023, in connection with Application No. ~~06-03-020, and is by~~ A.23-12-011, and is incorporated herein by this reference ~~made a part hereof~~. A statement of SCE's corporate information is attached hereto as ~~Appendix~~ APPENDIX E.

E. ~~Deposit for Costs (CPUC Rule 2.5)~~

~~Pursuant to Rule 1.16 of the Commission's Rules of Practice and Procedure, SCE will submit a filing fee of \$500.00 to the CPUC Docket Office along with this Application. CPUC Rule 2.5 provides that an applicant include a deposit, to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report, when the~~

~~Commission is acting as the lead agency pursuant to CEQA. SCE has complied with Rule 2.5 by sending a deposit in the amount of \$64,500 to the Commission's Docket Office on April 21, 2023. The remaining deposits will be sent to the Commission according to the schedule set forth in Rule 2.5(e).~~

A copy of SCE's Certificate of Determination of Preferences of the Series M Preference Stock filed with the California Secretary of State on November 17, 2023, and presently in effect, certified by the California Secretary of State, was filed with the Commission on December 15, 2023, in connection with Application No. A.23-12-011, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series N Preference Stock filed with the California Secretary of State on May 8, 2024, and presently in effect, certified by the California Secretary of State, was filed with the Commission on May 15, 2024, in connection with Application No. A.24-05-007, and is incorporated herein by this reference.

Copies of SCE's latest Annual Report to Shareholders and Edison International's latest proxy statement was sent to its stockholders and has been sent to the Commission with an Energy Division Central Files Document Coversheet dated April 15, 2025, pursuant to General Order Nos. 65-A and 104-A of the Commission.

E. ~~F.~~ Financial Balance Sheet and Statement of Income (CPUC ~~Rules~~Rule 2.3, 3.1(g))

Pursuant to CPUC ~~Rules~~Rule 2.3 ~~and 3.1(g)~~, SCE's most recently available balance sheet and income statement are attached hereto as ~~Appendix~~APPENDIX F.

E. Service Territory

SCE's service territory is located in 15 counties in central and southern California, consisting of Fresno, Imperial, Inyo, Kern, Kings, Los Angeles, Madera, Mono, Orange, Riverside, Santa Barbara, San Bernardino, Tulare, Tuolumne,⁷ and Ventura Counties, and includes approximately 201 incorporated communities as well as outlying rural territories. A list

⁷ SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

of the counties and municipalities served by SCE is attached to SCE's Original Application as APPENDIX G. SCE also supplies electricity to certain customers for resale under tariffs filed with the Federal Energy Regulatory Commission.

G. Competing Entities for EPL Project (CPUC Rule 3.1(b))

~~The proposed construction in California lies entirely within the boundaries of SCE's existing service territory, and, as such, it will not compete with any other utility, corporation or person. The EPL Project traverses approximately 27 miles of NV Energy service territory in order to connect to the Eldorado Substation, an existing SCE facility. As such, the Project will not compete with any other utility, corporation or person.~~

H. Permits Required (CPUC Rule 3.1(d))

~~Pursuant to CPUC Rule 3.1(d), agency permits likely required for the Project are described in PEA Section 3.10 and attached hereto as Appendix J.~~

I. Annual Revenue Requirement (CPUC Rule 3.1(h); Public Utilities Code § 1003(d))

~~Pursuant to CPUC Rule 3.1(h) and Public Utilities Code Section 1003(d), SCE's annual revenue requirement is attached hereto as Appendix H.~~

J. Project Plan (Public Utilities Code §§ 1003(b) & (e))

~~Pursuant to Public Utilities Code Sections 1003(b) and (e), a Project Plan describing plans for the project's implementation, design, construction management, and cost control is attached hereto as Appendix A.~~

G. ~~K. CPCN Application Requirements (Location of Items Required in Permit to Construct Pursuant to G.O. 131-D § IX.A)~~ E Section VII.B

~~Information required in a CPCN Application is discussed in the following text. The CPCN Application requirements of G.O. 131-D Section IX.A are shown in bold italics, and~~

~~SCE's discussion follows in plain text. As indicated below, much of the information required to be included in a CPCN application is found in the PEA filed with this Application.~~

Much of the information required to be included in a PTC application pursuant to G.O. 131-E, Section VII.B is found in the PEA filed with the Original Application.

Required PTC application information has been cross-referenced to the PEA in the following text. The PTC application requirements of G.O. 131-E, Section VII.B are in **bold italics**, and the PEA references follow in bulleted plain text.

1. ~~A **described**~~ description of the proposed ~~transmission~~**power line or substation or switchyard** facilities, including the proposed ~~transmission~~**power line route and alternative routes, if any; proposed transmission power line equipment;** such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc.; and a proposed schedule for ~~certification~~**authorization, construction, and commencement of operation of the facilities.**

~~Pursuant to G.O. 131-D Section IX.A.1.a, CPUC Rule 3.1(a), and Public Utilities Code Section 1003(a), a~~A detailed description of the EPL Project and alternatives considered is included throughout the PEA, including in the PEA Executive Summary ~~and Chapter 2, Chapter 2, and Chapter 3, particularly in~~satisfying G.O. 131-E Section ~~3.6.4 (“Construction Schedule”)~~VII.B.2.a. Alternatives to the EPL Project are discussed in PEA Chapter 4, but no route alternatives or route variations were identified given that the deficiencies identified for remediation, which are the purpose of the EPL Project, are fixed in space along the existing transmission route.

Descriptions of the EPL Project alignment, referring to the locations where work generally would be done, are described in the PEA in Section 3 (“EPL Project Description”) and all subsections contained therein, and illustrated in figures and figure sets 3.1-1 (“Project Overview by Segments”).

The physical characteristics of the equipment proposed to be included in the EPL Project are described in the PEA in Chapter 3, particularly in Section 3.3 (“Project Components”) and all subsections contained therein, and illustrated in figures and figure sets 3.5-1 (“Staging Areas”) and 3.5-2 (“Typical Pull-and-Tension/Stringing Site Setup”). The physical characteristics of alternatives to the EPL Project are described in Chapter 4 of the PEA.

The EPL Project Schedule discussed in PEA Section 3.6.4 (“Construction Schedule”) is outdated. An updated construction schedule is attached to this Amended Application as APPENDIX A.

2. A map of ~~suitable scale of~~ the proposed power line routing or substation or switchyard location showing details of the right-of way in the vicinity of settled populated areas, parks, recreational areas, scenic areas, and existing electrical transmission or power lines within ~~one mile~~ 300 feet of the proposed route or substation or switchyard.

~~Pursuant to Satisfying~~ G.O. 131-~~DE~~ Section ~~IX.VII.AB.12.b~~ and ~~CPUC Rule 3.11~~, maps of the regional and local Project setting are included in the PEA as figures and figure sets 3.1-1a, 2.1-1b, 3.1-1b, ~~3.5-1~~ 3.5-1, 5.4-1, 5.1-1, 5.1-2, 5.1-4, 5.1-4a, 5.1-4a-1, 5.1-4a-2, 5.1-4a-3, 5.1-4a-4, 5.1-4a-5, 5.1-4a-6, 5.1-4a-7, 5.1-4a-8, 5.1-4a-9, 5.1-4a-10, 5.1-4a-11, 5.1-4a-12, 5.1-4a-13, -14, -15, -16, 5.11-1, 5.16-1, and 5.19-1.

~~3. A statement of facts and reasons why the public convenience and necessity require the construction and operation of the proposed transmission facilities.~~

~~Pursuant to G.O. 131-D Section IX.A.1.c and CPUC Rule 3.11, the facts and reasons why the public convenience and necessity require the EPL Project’s construction and operation are described in Sections II and III of this Application, as well as PEA Chapter 1, Chapter 2, and particularly Section 1.1.1 (“Purpose and Objective”). The EPL Project would bring existing transmission lines into compliance with G.O. 95 and NESC standards, the purpose of which is ensure adequate service and secure safety to persons engaged in the construction, maintenance,~~

~~operation or use of overhead lines and to the public in general. The EPL Project would also help maintain reliable service to customers served by the subject lines, substations, and a switchyard.~~

~~4. A detailed statement of the estimated cost of the proposed facilities.~~

~~Costs of the EPL Project, including contingency, are estimated at \$223 million in 2023 constant dollars. The EPL Project's estimated costs are discussed in detail in Section IV of this Application and the estimated Project cost table is attached as Appendix I.~~

~~3. 5. Reasons for adoption of the power line route or substation or switchyard location selected, including comparison with alternative routes, or locations, including the advantages and disadvantages of each.~~

~~Pursuant to~~ Satisfying G.O. 131-~~DE~~ Section ~~IXVII.AB.12.ec~~, the reasons for the adoption of the selected transmission route and comparison to alternatives considered can be found in Chapter 4 of the PEA. Because the EPL Project involves the reconductoring of portions of existing transmission lines rather than the construction of new transmission lines, project planning did not involve the adoption of any new transmission routes.

~~6. A schedule showing the program of right-of-way acquisition and construction.~~

~~Pursuant to G.O. 131-D Section IX.A.1.f, a schedule for the EPL Project's construction, including all procurement activities, is included in PEA Section 3.6.4.1 and in Appendix A, Project Plan.~~

4. ~~7.~~ A listing of the governmental agencies, including Tribal governments, with which proposed power line route review or substation or switchyard location reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.

~~Pursuant to~~ Satisfying G.O. 131-~~DE~~ Section ~~IXVII.AB.12.gd~~, SCE reviewed the EPL Project with the following governmental agencies:

- CPUC: SCE has provided updates to the CPUC Energy Division staff on the EPL Project on a regular basis since 2016.
- Bureau of Land Management ("BLM"): SCE has met with representatives of the BLM regarding the EPL Project on a regular basis since 2017.
- National Park Service ("NPS"): SCE has met with representatives of the NPS regarding the EPL Project on a regular basis since 2017.
- San Bernadino County: SCE has met with representatives of San Bernardino County regarding the EPL Project on a regular basis since 2019. The county has not communicated any issues or concerns with the project as proposed.
- City of Hesperia: SCE Local Public Affairs staff communicated with the City of Hesperia regarding the EPL Project in 2022. The city has not communicated any issues or concerns with the project as proposed.
- Clark County: SCE Local Public Affairs staff communicated with Clark County regarding the EPL Project in 2021. The county has not communicated any issues or concerns with the project as proposed.
- City of Boulder City: SCE Local Public Affairs staff communicated with the City of Boulder City regarding the EPL Project in 2021. The county has not communicated any issues or concerns with the project as proposed.
- Native American Heritage Commission ("NAHC"): SCE has informed the NAHC regarding the EPL Project ~~per G.O. 131-D~~.

5. ~~8.~~ A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rules of Practice and Procedure, Rule ~~2.432.4~~ and 2.5. If a PEA is filed, it may include the data described in Items a, through ~~gd~~, above.

~~Pursuant to G.O. 131-D Section IX.A.1.h, the PEA is submitted concurrently with this application and is attached as Attachment A.~~

SCE submitted a PEA with the Original Application in April 2023. A copy of the PEA is available at: https://ia.cpuc.ca.gov/environment/info/panoramaenv/EPL_TLRR/index.html. As stated above, the changes associated with this application do not relate to the physical scope of the EPL Project and therefore do not require changes to the PEA.

6. ~~L.~~ EMF Discussion (G.O. 131-D § ~~X~~E, Section VII.B.2.e)

G.O. 131-~~DE~~, Section ~~XVII.B.2.e~~, requires ~~that an Application~~ applications for a ~~CPCN~~ PTC to describe measures ~~taken~~ proposed by the utility to reduce potential exposure to electric and magnetic fields ("EMF") generated by the proposed facilities. A complete description of EMF-related issues is contained in SCE's Field Management Plan for ~~this~~ the EPL Project ~~at Appendix, included as part of the CPCN Application as APPENDIX B.~~ Based on the evaluation of the EPL Project's proposed route and configuration, SCE will apply no-cost magnetic field reduction measures documented in the Field Management Plan according to the CPUC EMF Policy.

7. ~~M. Public Notice~~ Compliance with Other Applicable Commission Policies (G.O. 131-D § ~~XI.A~~E, Section VII.B.2.f)

~~Pursuant to G.O. 131-DE, Section XI.A, notice of this Application shall be given within ten days of filing the Application by mail, by advertisement, and by posting: (1) to certain public agencies and legislative bodies; (2) to owners of property located on or within 300 feet of the Project area; (3) by advertisement in a newspaper or newspapers of general circulation; and (4) by posting a notice on-site and off-site at the project location.~~ VII.B.2.f, requires applications for a PTC to demonstrate compliance with other applicable Commission policies (e.g., the

Environmental and Social Justice (“ESJ”) Action Plan). The EPL Project would benefit all of SCE’s customers, including ESJ communities, by repairing existing infrastructure to maintain system reliability. These repairs would improve service reliability and would mitigate safety risks associated with physical clearance discrepancies. Among other things, these repairs would also directly support attainment of Goals 4 and 6 of the Commission’s ESJ Action Plan. Goal 4 of the ESJ Action Plan focuses on increasing climate resilience in ESJ communities. The EPL Project would support ESJ Action Plan Goal 4 by eliminating existing discrepancies, thereby improving system reliability and climate resilience. Goal 6 of the ESJ Action Plan focuses on the safety of ESJ communities by ensuring utility compliance with CPUC regulations. The EPL Project would support ESJ Action Plan Goal 6 by ensuring compliance with CPUC G.O. 95 standards which contribute to the safe and reliable operation of the electric system.

~~SCE has given, or will give, proper notice within the time limits prescribed in G.O. 131-D. The Notice will be published in local newspapers of general circulation. A copy of the Notice and listing of publishing newspapers is provided as Appendix C. A Certificate of Service confirming distribution of the CPCN Notice to owners of property located on or within 300 feet of the Project area, relevant governmental agencies, and certain interested parties is attached hereto as Appendix D.~~

H. Public Notice (G.O. 131-E, Section VIII.A)

Public notice of the CPCN Application was provided pursuant to G.O. 131-D at the time the Original Application was filed. Noticing requirements for a CPCN/PTC are described in G.O. 131-E, Section VIII.A. These noticing requirements were satisfied by SCE’s prior notice, described in the Original Application. A copy of the Notice of Application for a Certificate of Public Convenience and Necessity and list of newspapers which published the original notice are contained in the Original Application as APPENDIX C. A copy of the Certificate of Service of Notice of Application for a Certificate of Public Convenience and Necessity and a service list are contained in the Original Application as APPENDIX D.

I. ~~**N. Supporting Appendices and Attachments**~~ **Compliance with Rule 2.5**

Rule 2.5 of the Commission's Rules of Practice and Procedure provides that an applicant include a deposit to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report when the Commission is acting as the lead agency pursuant to CEQA. In accordance with Rule 2.5, SCE has already submitted the required deposit to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report for the revised EPL Project. The deposit was made on April 21, 2023.

~~The PEA is included as Attachment A. In addition, Appendices A through N listed below are made a part of this Application:~~

- ~~• Appendix A—Project Plan (Schedule)~~
- ~~• Appendix B—Field Management Plan~~
- ~~• Appendix C—Notice Of Application~~
- ~~• Appendix D—Certificate of Service~~
- ~~• Appendix E—Corporate Information~~
- ~~• Appendix F—Balance Sheet & Statement of Income as of December 31, 2022~~
- ~~• Appendix G—List of Counties and Municipalities Served by SCE~~
- ~~• Appendix H—Annual Revenue Requirement~~
- ~~• Appendix I—Estimated EPL Project Costs~~
- ~~• Appendix J—Permit List~~
- ~~• Appendix K—Project Map~~

J. ~~**O.**~~ **Request for Ex Parte Relief**

SCE requests that the relief requested in this Amended Application be provided ex parte.

K. ~~**P.**~~ **Request for Timely Relief**

SCE requests the Commission issue a decision within the time limits of the schedule proposed by SCE in this ~~application~~ Amended Application.

VII.

CONCLUSION

Upon completion of its review of this Amended Application, SCE requests ~~that~~ the Commission issue and certify an appropriate environmental document and issue a ~~CPCN~~PTC authorizing SCE to construct the EPL Project set forth in this Amended Application and ~~the~~ PEA.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ ~~Heather D. Rivard~~

Orville O. Cocking

~~By: Heather D. Rivard~~

By: Orville O. Cocking

Senior Vice President, ~~Transmissions &~~ Transmission and
Distribution

/s/ Lauren Goschke

By: Lauren Goschke

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~~April 21, 2023~~

September 5, 2025

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ~~18th~~4th day of ~~April~~September, ~~2023~~2025, at ~~Rosemead~~Pomona, California.

/s/ ~~Heather D. Rivard~~ Orville O. Cocking
By: ~~Heather D. Rivard~~Orville O. Cocking
Senior Vice President, ~~Transmissions &~~ Transmission and
Distribution
SOUTHERN CALIFORNIA EDISON COMPANY