

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

In the Matter of the Application of SOUTHERN )	
CALIFORNIA EDISON COMPANY (U 338-E) )	A.15-04-013
for a Certificate of Public Convenience and )	(Filed April 15, 2015)
Necessity for the Riverside Transmission )	
<u>Reliability Project</u> )	

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) SUPPLEMENTAL  
RESPONSE TO THE DEFICIENCY REPORT FOR THE RIVERSIDE TRANSMISSION  
RELIABILITY PROJECT APPLICATION (A.15-04-013)**

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Dated: **September 18, 2015**

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CALIFORNIA EDISON COMPANY (U 338-E) )  
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On April 15, 2015, Southern California Edison Company (“SCE”) filed Application No. 15-04-013 for a Certificate of Public Convenience and Necessity (“CPCN”) to permit SCE to construct a portion of the Riverside Transmission Reliability Project (“RTRP” or “Project”). SCE’s CPCN Application was subsequently amended on April 30, 2015.

On or about May 22, 2015, SCE received correspondence from the California Public Utilities Commission (CPUC) identifying certain deficiencies in SCE’s CPCN Application. These deficiencies were summarized in the *Deficiency Report for the Riverside Transmission Reliability Project Application (A.15-04-013)* (“Deficiency Report”). SCE’s *Response to the*

*California Public Utilities Commission's Deficiency Report for the Riverside Transmission Reliability Project Application (A.15-04-013)* ("Response") was filed on or about July 24, 2015.<sup>1</sup>

Attachment 6 to the Response included SCE's *Riverside Transmission Reliability Project (RTRP) 230 kV Underground Alternatives Desktop Study, July 2015* ("UG Alternatives Study").

While SCE's analyses to date indicate that the route proposed in SCE's RTRP CPCN Application remains the environmentally superior route, SCE anticipates that the CPUC will consider underground recommendations suggested in several protests submitted by neighboring developments with respect to SCE's CPCN Application. The UG Alternatives Study considered the feasibility of constructing a significant portion of RTRP's proposed 230 kV Transmission Line using underground methods along three alternative routes:

- RTRP Final EIR Route;
- Pats Ranch Road Route; and
- Wineville Avenue Route.

SCE hereby files its *Supplemental Response to the Deficiency Report for the Riverside Transmission Reliability Project Application (A.15-04-013)* ("Supplemental Response"), included as Attachment 1 hereto. This Supplemental Response presents a preliminary comparison of the estimated costs to construct the three alternative underground routes described in SCE's UG Alternatives Study. Appendix B, *Underground Alternative Routes: EIR UG Route; Pats Ranch Road Route; and Wineville Avenue Route*, from the UG Alternatives Study identifies the underground routes referenced above and is included as Attachment 2 hereto for convenient reference.

Consistent with the scope of the UG Alternatives Study and the limitations expressed in Section 2.0 of same, *Limitations of this Desktop Study for Underground Transmission*, the

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<sup>1</sup> Pursuant to Commission's Rules of Practice and Procedure 1.9(d)(4) and 1.6(a), SCE's Response is available online. The following instructions may be used to access the Response: (1) go to [www.sce.com/applications](http://www.sce.com/applications); (2) under "CPUC Open Proceedings," type A.15-04-013 into the search box; (3) click "Go"; and (4) from the Search Results screen, click the icon in the "Attachment" column that corresponds to the Response described herein.

preliminary estimated costs presented in this Supplemental Response likely do not capture all details necessary to precisely determine the costs of the underground routes analyzed in the UG Alternatives Study. Variables which are unknown, unconfirmed, and/or which have not been studied to date, including certain environmental impacts, field conditions, land use and real property issues (including need for appropriate access and rights-of-way), need for specialized electrical facilities and infrastructure, and the confirmed presence of existing utilities (including existence and depth of underground utilities), could materially affect the cost of any undergrounding route.

Respectfully submitted,

IAN M. FORREST

/s/ Ian Forrest

By: Ian Forrest

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September 18, 2015

**ATTACHMENT 1**

***SCE's Supplemental Response to the California Public Utilities Commissions' Deficiency  
Report for the Riverside Transmission Reliability Project Application (A.15-04-013)***

**Riverside Transmission Reliability Project (RTRP) Preliminary Estimated Cost Comparison  
RTRP Final EIR Overhead (OH) transmission route vs. Underground (UG) Scenarios  
described in SCE's RTRP 230 kV Underground Alternatives Desktop Study, July 2015**

**2015 Dollars**

Project Element	Project Cost <sup>1</sup>			
	As filed in CPCN application (~10 mi OH)	UG EIR Route Alternative (~5.5 mi OH, ~4.5 mi UG)	UG Pats Ranch Route Alternative (~5.5 mi OH, ~4.1 mi UG)	UG Wineville Route Alternative (~5.5 mi OH, ~3.6 mi UG)
<b>Network Upgrades (NU)</b>				
Licensing	\$6	\$8	\$8	\$8
Substation	\$17	\$16	\$16	\$16
Substation Reactive Compensation	n/a	\$28	\$28	\$28
Transmission (>200kV) - Overhead (OH)	\$80	\$44	\$44	\$44
Transmission (>200kV) - Underground (UG)	n/a	\$186	\$180	\$163
Telecom	\$2	\$2	\$2	\$2
Edison Carrier Solutions	\$1	\$1	\$1	\$1
Power System Control	\$0.1	\$0.1	\$0.1	\$0.1
Real Properties	\$74	\$55	\$41	\$41
Environmental	\$14	\$10	\$10	\$10
<b>Direct Expenditures</b>	<b>\$194</b>	<b>\$349</b>	<b>\$328</b>	<b>\$311</b>
<b>Contingency<sup>2</sup></b>	<b>\$28</b>	<b>\$95</b>	<b>\$90</b>	<b>\$84</b>
<b>Total Direct Expenditures with Contingency</b>	<b>\$222</b>	<b>\$443</b>	<b>\$419</b>	<b>\$396</b>

**NOTES:**

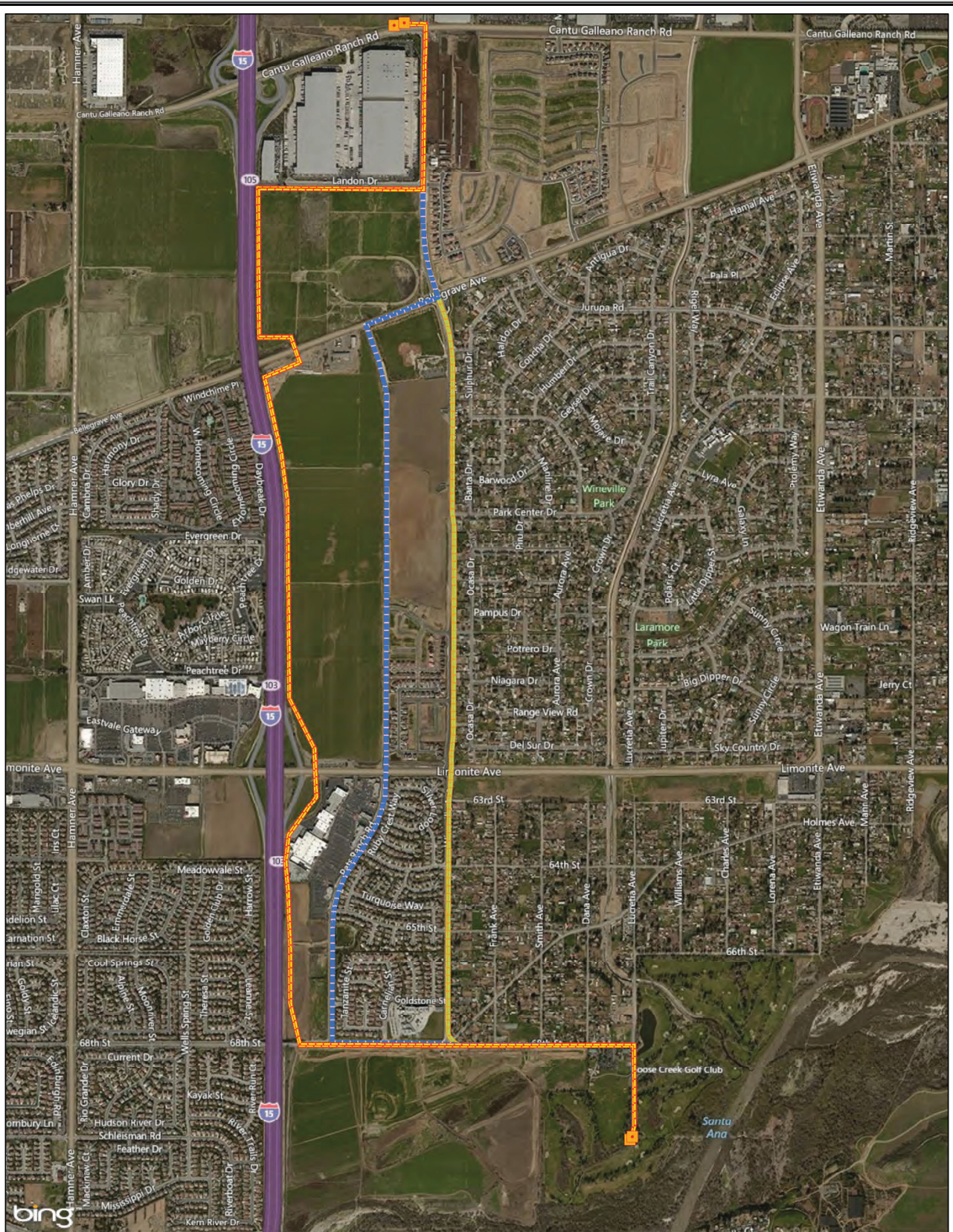
<sup>1</sup> Direct Costs in millions of 2015 constant dollars, excludes corporate overhead and cost of financing

<sup>2</sup> Contingency as filed in CPCN Application is 15%, contingency for Reactive Compensation & UG Transmission is 35%

## **ATTACHMENT 2**

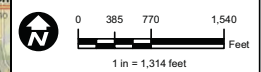
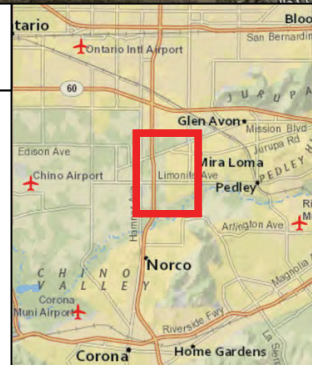
***Appendix B, Underground Alternative Routes: EIR UG Route; Pats Ranch Road Route; and  
Wineville Avenue Route from  
SCE's Riverside Transmission Reliability Project (RTRP) 230 kV Underground Alternatives  
Desktop Study, July 2015***





## RTRP Underground Routes Evaluated Overview Map

- Riser
- EIR Route (Modified 68th St)
- - - Pats Ranch Road Route
- Wineville Avenue Route



Notification #: 201864893  
Date: 7/23/2015  
File Name: RTRP\_UndergroundRoutesEvaluated\_20150723.mxd  
Version #: 01

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A.15-04-013  
(Filed April 15, 2015)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUPPLEMENTAL RESPONSE TO THE DEFICIENCY REPORT FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT APPLICATION (A.15-04-013)** by the means identified below:

- [X]** Transmitting the copies via e-mail to all parties who have provided an e-mail address
- [X]** Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Assigned ALJ(s) or other addressee(s).

**ALJ Hallie Yacknin  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102**

Executed this **Friday, September 18, 2015** at Rosemead, CA.

*/s/ Cheryl Lawson*

**Cheryl Lawson, Legal Admin Assistant**  
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Commission



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**LIST NAME: LIST**  
**LAST CHANGED: JULY 6, 2015**

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