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Subject: Comments of the Public Advocates Office on the Initial Study/Mitigated Negative Declaration for Southern California Edison Company's Eldorado-Lugo-Mohave Series Capacitor Project – Application (A.) 18-05-007

INTRODUCTION

The Public Advocates Office hereby submits these comments on the Initial Study/Mitigated Negative Declaration (MND) for Southern California Edison Company's (SCE's) Eldorado-Lugo-Mohave Series Capacitor Project (ELM). Based on the California Public Utilities Commission's (Commission) Energy Division's Initial Study, the Commission intends to adopt an MND under the California Environmental Quality Act (CEQA). The Public Advocates Office has reviewed the MND and recommends the following modifications to the MND:

- A specific in-service date should not be a project objective; and
- “Planned generation resources” should be more thoroughly defined to identify the resources for which the proponents are seeking to establish full capacity deliverability status (FCDS).¹

¹ Full capacity deliverability status provides resources the opportunity to generate more revenue through other revenue streams such as resource adequacy credits.

DISCUSSION

The Public Advocates Office recommends the following modifications to the MND:

A. A SPECIFIC IN-SERVICE DATE SHOULD NOT BE A PROJECT OBJECTIVE

Section 1.1 and Section 4.2.2 of the MND, both titled “Project Objectives,” state that it is an objective to “meet the target in-service date of June 2021 in an effort to support the requirements as outlined and required by the California Renewables Portfolio Standard (RPS)...”² However, this appears to be a self-imposed deadline. The project proponent (SCE) claims the purpose of its requested online date is to help meet the 33% renewable target, but California's three large Investor Owned Utilities (IOUs) collectively already exceed this target because they serve 36% of their 2017 retail electricity sales with renewable power.³ Furthermore, Decision 19-06-023⁴ provides the latest requirements for RPS procurement and in the case of SCE, its 2021 target is 35.75% of retail load,⁵ which it has already surpassed with 36.5% of its retail sales coming from RPS eligible resources in 2018.⁶ Moreover, SCE states that it forecasts a net long position through the end of Compliance Period 6 (2028-2030) and beyond, and that SCE currently does not have a need for additional RPS-eligible energy.⁷ This highlights that this project is not needed to meet SCE’s 2021 RPS target.

It is a matter for the Commission to decide the need for, and relative contribution of, this project to SCE’s RPS requirement. Therefore, the MND should not tie the hands of the Commission by imposing an in-service date. If the Commission should decide that the project is necessary, it will prescribe the necessary in-service date.

Another reason why a time objective is inappropriate is that the Initial Study, upon which the MND is based, has no aspect of time for the project that negatively affects the environment. Nor

² MND, pp. 1-1 and 4-7.

³ See <https://www.cpuc.ca.gov/rps/>.

⁴ Decision in Rulemaking 18-07-003: To Continue Implementation and Administration, and Consider Further Development of, California Renewables Portfolio Standard Program.

⁵ D.19-06-023, pg. 7.

⁶ Table IV-1: Percentage of SCE’s Retail Sales from RPS-Eligible Resources, Southern California Edison Company’s 2019 Draft Renewables Portfolio Standard Procurement Plan (SCE 2019 Draft RPS Plan), p. 9.

⁷ SCE 2019 Draft RPS Plan, p. 14.

was the review of environmental effects predicated on the timing of the project.⁸ Therefore, for all the above reasons, the language “meet the target in-service date of June 2021 in an effort to...” should be removed from the MND.

B. “PLANNED GENERATION RESOURCES” SHOULD BE MORE THOROUGHLY DEFINED TO IDENTIFY THE RESOURCES THAT ARE SEEKING FULL CAPACITY DELIVERABILITY STATUS

Section 4.2.2 of the MND, "Project Objectives" states that it is an objective to "integrate planned generation resources in order for those facilities to become fully deliverable."⁹ However, it is unclear what is meant by the use of the word “planned.” “Planned” could mean projects with existing agreements, executed interconnection agreements, projects at an earlier stage of the California Independent System Operator’s (CAISO’s) interconnection process, or even projects that are in development. Table 2-1 of SCE’s Proponent’s Environmental Assessment (PEA) includes projects at various stages of development, from parked¹⁰ to undergoing study to executing interconnection agreements.¹¹ Clearly stating at which point in the CAISO’s interconnection process a project enters into the justification for the Eldorado-Lugo-Mohave Series Capacitor project will allow the Commission’s permitting process to progress with more specific, quantifiable information and preemptively resolve any potential confusion. Therefore, the scope of projects that ELM aims to help in achieving FCDS should be narrowed by more thoroughly defining “planned generation resources” in the MND.

⁸ “Mitigated negative declaration” means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment...” 14 CCR § 15369.5.

⁹ MND, p. 4-8.

¹⁰ As used by SCE in its PEA, this term means that a project is stalled or on hold within the interconnection queue.

¹¹ Table 2-1: Interconnection Requests that Require Completion of the Proposed Project, Proponent’s Environmental Assessment.

CONCLUSION

For the above reasons, the Public Advocates Office recommends that the MND be modified to (1) not include specific in-service dates in the project objectives, and (2) establish a more specific definition for “planned generation resources”.

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