



August 26, 2025

Sent via electronic mail:

Eric Chiang
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Clarifications to ELM Series Capacitor Project - Minor Project Revision #8

Dear Mr. Chiang,

SCE's Minor Project Revision (MPR) submitted February 7, 2025 ("February MPR"), asked the CPUC to permit SCE to install the AC mitigation required pursuant to Mitigation Measure UT-1 (MM UT-1) ("AC Mitigation") after the projected in-service date for the all six ELM Project capacitors ("Series Capacitors"), as a modification to the original MM UT-1 which required the AC Mitigation to be complete prior to in-servicing the Series Capacitors.

In its February MPR request, SCE explained that once the Series Capacitors were in-serviced all 3,300 Amps of the ELM Project would be available, however SCE did not expect the 500kV transmission lines that make up the ELM Project to operate fully at their post-ELM operating limits until 2028. SCE also stated it did not plan to operate the Lugo-Mohave Transmission Line (L-M T/L) to loading levels significantly beyond the 2024 historical peak value of 1300 Amps until the AC Mitigation was in place. SCE's February MPR explained that as a precaution in connection with the variance from the MM UT-1 requirements SCE would continue to operate the L-M T/L portion of the ELM Project that parallels SoCalGas's pipelines at the pre-ELM Project equipment rating of 2,400 Amps with peak loads consistent with historical levels, by bypassing one or more Series Capacitors on the L-M T/L until the AC Mitigation is complete. SCE stated in its January MPR request that this approach is not expected to create any new significant impacts or increase in severity of any existing impact to any resources.

The CPUC approved SCE's February MPR on February 11, 2025. SCE interprets the language of the approval to limit the operation of the L-M T/L to 1,300 Amps, which is lower than the current equipment rating of 2,400 / 3,240 Amps. SCE believes it would need to derate the L-M T/L below its current line rating to implement this restriction and that limiting the system to operate at or below 1,300 Amps under all conditions could result in the inability of system operators to safely and reliably operate the transmission system.

SCE respectfully asks the CPUC to revise the language of the February MPR as proposed below, to clarify that SCE will continue to operate the L-M T/L at its current rating, by removing one or more of the Series Capacitors on the L-M T/L from service until the AC Mitigation is complete.

SCE intends to operate the line similar to historical levels. However, because the L-M T/L has a current rating up to 2,400 Amps, SCE may need to operate the L-M T/L above 1,300 Amps for certain periods of time, for example, as a result of outages on other transmission facilities, during periods when system conditions would necessitate importing additional power to serve load demand, and/or fault conditions. If such conditions are planned, predicted, or are found to exist, SCE will promptly notify SoCalGas in advance or as soon as practicable once SCE becomes aware of such conditions. Upon notice, SCE shall coordinate with SoCalGas to enable SoCalGas to implement increased safety and infrastructure protective measures. This clarification is not expected to create any new risk, including risks to SoCalGas pipelines, infrastructure or work crews, or create new significant impacts or increase in severity of any existing impact to any resource as it would not result in a change to the existing condition.

SCE's proposed clarifications to the February MPR are shown below, with the original language shown in black, revisions in ~~red strikethrough~~ and proposed additions underlined in green:

Proposed Revision:

The MPR applies only to the Lugo-Mohave Transmission Line (L-M T/L) sections of the ELM Project, where SoCalGas has planned AC Mitigation for their pipelines. Although the Series Capacitors installed on the ~~line L-M T/L~~ will increase line capacity from 2,400 Amps to 3,300 Amps, as a precaution, until the AC Mitigation is installed by SoCalGas, ~~SCE will not operate the L-M T/L above the historic value for the line. The historical peak value for 2024 did not exceed 1300 Amp.~~ SCE will operate the L-M T/L by bypassing one or more series capacitors such that the L-M T/L does not operate above the historical peak of 1,300 Amps unless necessary as a result of outages on other transmission facilities, during periods when system conditions would necessitate importing additional power to serve load demand, and/or fault conditions ("Increased Load Conditions"). Additionally, SCE will delay requesting that CAISO re-rate the line to the post-ELM rating until SCE has written confirmation from SoCalGas that the AC mitigation work is complete.

If Increased Load Conditions are planned, predicted or are found to exist, SCE will promptly notify SoCalGas in advance or as soon as practicable once SCE becomes aware of such condition. In the event of delays in the completion of the AC mitigation work, SCE will notify the CPUC and will continue to operate the L-M T/L as described above until the AC mitigation work is complete. ~~without exceeding the 1,300 Amp limit.~~

We appreciate your attention to this matter. Please reach out if you have any questions.

Sincerely,



Thomas E. Diaz
SCE Regulatory Affairs – Senior Advisor

cc:

Selya Arce (SCE)

Sylvia Granados (SCE)