

Southern California Edison
A.19-07-015 – TLRR IC

DATA REQUEST SET E D - D a t a R e q u e s t - 0 0 8

To: Energy Division
Prepared by: Nora Harris
Job Title: TLRR Program Sponsor
Received Date: 11/19/2020

Response Date: 12/11/2020

Question 01a:

SCE has stated its need to comply with the requirements of CPUC's General Order (G.O.) 95 and with requirements of the North American Electric Reliability Corporation (NERC).

What are the specific CPUC G.O.95 requirements related to schedule or compliance timing?

Response to Question 01a:

CPUC GO 95 Rule 18 specifies maximum time frames for correcting what SCE has identified as "discrepancies." Although Rule 18 allows correction times to be extended under reasonable circumstances, SCE's preference is to initiate repairs and reconstruction as soon as possible. Nevertheless, due to the size and scope of work required across the entire TLRR Program, SCE has for several years continued to inform the CPUC and other organizations that remediation of all identified discrepancies is likely to take through at least 2025. This is longer than the prescribed compliance timelines in GO 95; however, SCE continues to provide quarterly updates to the CPUC Safety Enforcement Division (SED) and semi-annual updates to WECC on the Transmission Line Rating Remediation Program progress.

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Question 01b:

SCE has stated its need to comply with the requirements of CPUC's General Order (G.O.) 95 and with requirements of the North American Electric Reliability Corporation (NERC).

What are the specific requirements and timelines with which SCE is complying for NERC?

Response to Question 01b:

During an October 2014 SCE meeting with NERC, SCE informed NERC that it planned to remediate all clearance discrepancies on the Bulk Electric System by December 31, 2025, and all clearance discrepancies on the radial subtransmission system by December 31, 2030. This clearance discrepancy remediation will ensure SCE's adherence with NERC Reliability standard FAC-008-3 and associated requirements. SCE has kept WECC, as the delegated enforcement authority for NERC, informed, through semi-annual updates, of the progress of the TLRR program.

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Question 02:

What date was defined in SCE's mitigation plan for addressing its identified discrepancies, as filed with and accepted by WECC in 2007?

Response to Question 02:

SCE's 2007 mitigation plan committed to completing a Light Detection and Ranging (LiDAR) study to analyze and re-rate all bulk electric system transmission circuits and California Independent Service Operator (CAISO)-controlled subtransmission lines and verifying conductor sag conditions by 2012. The 2007 mitigation plan included a commitment to design and implement mitigations if the carrying capacity of a line did not meet the current conditions, but did not include a timeline for completing the mitigations. The 2010 Mitigation Plan submitted WECC included an estimate that SCE would complete engineering and construction activities by year 2025. Furthermore, during a meeting with NERC in October 2014, SCE informed NERC that it planned to remediate all clearance discrepancies on the Bulk Electric System by December 31, 2025, and all clearance discrepancies on the radial subtransmission system by December 31, 2030.

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To: Energy Division
Prepared by: Warnetta Logan
Job Title: Senior Project Manager
Received Date: 11/19/2020

Response Date: 12/11/2020

Question 03:

The April 2020 Amended PEA states “SCE is committed to undertaking all reasonable efforts to correct these discrepancies prior to January 1, 2025” (PTC Application, Section II), but the schedule attached to the PTC Application (Attachment C) and PEA Table 3.7-10 state that the project would be operational by April 2026. Please explain the apparent inconsistency between the 2025 and 2026 dates.

Response to Question 03:

The April 2020 Amended PEA references SCE’s original estimated completion of clearance discrepancy remediations by January 1, 2025. As identified in response to Question 1b of this Data Request, SCE informed WECC that it planned to remediate all clearance discrepancies on the Bulk Electric System, which includes the Ivanpah-Control Project circuits, by December 31, 2025.

Delays in the licensing process will jeopardize SCE’s ability to remediate all discrepancies prior to December 31, 2025. However, as stated in the PEA, SCE will continue to make reasonable efforts to correct discrepancies by the original estimated completion date.

At the time of the April 2020 filing, SCE estimated all remediation would be completed in April 2026. SCE continues to undertake efforts to design appropriate scopes to achieve all remediation activities within a reasonable timeframe. SCE currently estimates completion of remediation in 2026. This date remains dependent upon many factors, including timing of agency approvals. SCE will continue to revisit the project schedule and identify opportunities to reduce the permitting/licensing and construction schedules as the Project progresses through the regulatory review process.

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To: Energy Division
Prepared by: Warnetta Logan
Job Title: Senior Project Manager
Received Date: 11/19/2020

Response Date: 12/11/2020

Question 04a:

We note that the 2020 Amended PTC schedule shows construction starting in January of 2023. However, the NEPA schedule provided to SCE and the CPUC by the Bureau of Land Management (BLM) in August of 2020 shows that the BLM would issue its Record of Decision (ROD) in March of 2023.

Please describe the effect on the construction schedule and expected construction start date if SCE does not obtain a decision on the project until March of 2023.

Response to Question 04a:

SCE anticipates that the construction of the Ivanpah-Control Project would take approximately 39 months, as stated in PEA Section 3.7.6 Construction Schedule. The start of Project construction is dependent upon the timing of agency approvals, in addition to other factors that include, but are not limited to, inclement weather, stoppages necessary to protect biological resources (e.g., nesting birds) or outages and outage constraints. Therefore, if SCE does not obtain the Record of Decision on the project until March of 2023, the Project completion would be further delayed. SCE does not expect the durations identified in the Project schedule to change, therefore the construction start date would continue to be approximately nine (9) months from final BLM and CPUC approval, dependent upon obtaining all other required permits. Construction duration is estimated to be approximately 39 months. SCE will continue to revisit the project schedule and look for opportunities to reduce the permitting/licensing and construction schedules as the Project progresses through the regulatory review process. SCE's main driver is to mitigate clearance discrepancies by the identified compliance date.

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To: Energy Division
Prepared by: Roni Mejia
Job Title: Senior Advisor
Received Date: 11/19/2020

Response Date: 12/11/2020

Question 04b:

We note that the 2020 Amended PTC schedule shows construction starting in January of 2023. However, the NEPA schedule provided to SCE and the CPUC by the Bureau of Land Management (BLM) in August of 2020 shows that the BLM would issue its Record of Decision (ROD) in March of 2023.

Please describe the effects on SCE's compliance with CPUC, NERC, and WECC requirements if construction is delayed based on BLM issuance of a ROD in March of 2023.

Response to Question 04b:

If the approval of the Ivanpah-Control Project is delayed, it may result in a delay to the completion of SCE's remediation efforts communicated to WECC and the CPUC. SCE has kept WECC, as the delegated enforcement authority for NERC, informed, through semi-annual updates, of the progress of the TLRR program. If remediation efforts are delayed SCE would likely need to update WECC and the CPUC with the new schedule. Please see Ivanpah-Control Data Request No. 8, Question 4a regarding scheduling details.

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Question 04c:

It is apparent that the BLM schedule may be further delayed with a ROD issued after March of 2023 due to SCE's later than anticipated submittal of the Plan of Development, and due to the late completion of Cultural Resources reports. Please describe the effect on SCE's compliance with CPUC, NERC, and WECC requirements if a decision is issued after March 2023 and construction is delayed further than identified in item 4.a, above.

Response to Question 04c:

If the approval of the Ivanpah-Control Project is delayed, it may result in a delay to the completion of SCE's remediation efforts communicated to WECC and the CPUC. SCE has kept WECC, as the delegated enforcement authority for NERC, informed, through semi-annual updates, of the progress of the TLRR program. If remediation efforts are delayed SCE would likely need to update WECC and the CPUC with the new schedule. Please see Ivanpah-Control Data Request No. 8, Question 4a regarding scheduling details.