



September 22, 2015

Via Email

Billie C. Blanchard and Frank McMenimen
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94014
westofdevers@aspeneg.com

Re: SCE West of Devers Upgrade Project (Application A.13-10-20) – NextEra Comments on the Draft EIR/EIS

Dear Ms. Blanchard and Mr. McMenimen:

NextEra Energy Resources, LLC (“NEER”) hereby submits the following comments on the Draft EIR/EIS for the Southern California Edison (“SCE”) West of Devers Upgrade Project (the “Proposed Project”). NEER is a party to the underlying proceeding before the California Public Utilities Commission (“CPUC”) relating to SCE’s underlying Application A.13-10-20, and has specific concerns regarding the scope of the environmental analysis set forth in the Draft EIR/EIS.

Specifically, NEER has ownership interests in four solar generating facilities and three wind generating facilities in the area potentially affected by the Proposed Project. NEER’s indirect subsidiary, Genesis Solar, LLC owns the Genesis Solar Energy Project (“GSEP”), a 250-MW solar thermal generation facility in east Riverside County. GSEP interconnects to the Colorado River Substation and is online. In addition, other NEER indirect subsidiaries own or have an ownership interest in three additional large solar generation facilities in east Riverside County. The 550 MW Desert Sunlight solar photovoltaic project interconnects to the Red Bluff substation and is online. The 250 MW McCoy solar photovoltaic project interconnects to the Colorado River Substation and is online. In addition, the Blythe Solar Power Project is a 485 MW facility under development that will also interconnect at the Colorado River Substation. NEER’s wind energy facilities in the region include the following facilities, all of which are online: FPL Energy Cabazon Wind, LLC, FPL Energy Green Power Wind, LLC, and FPL Energy WPP 93 GP, LLC.

Collectively, these facilities (the “NEER facilities”) all interconnect with transmission facilities that may be impacted during the construction of the Proposed Project due to interruptions in service. Such interruptions in service would directly and materially harm NEER by reducing the generation from NEER’s facilities, resulting in potentially significant economic impacts to NEER.

NextEra Energy Resources, LLC

700 Universe Boulevard, Juno Beach, FL 33408

Furthermore, reductions in the delivery of electrical generation from NEER's facilities likely will be counterbalanced by increased use of non-renewable energy sources by the California market, resulting in increased emissions and related impacts.

NEER is not opposed to the Proposed Project, but does have significant concerns about these issues as detailed below.

I. Project Objectives

SCE's Application, and its Proponent's Environmental Assessment (see, e.g., Section 1.3 of that document), set forth a number of Project Objectives (see p. A-5), including, *inter alia*, the following:

- Project Objective 3: "Meet project need while minimizing environmental impacts."
- Project Objective 4: "Facilitate progress toward achieving California's RPS (Renewable Portfolio Standard) goals in a timely and cost-effective manner by SCE and other California utilities."
- Project Objective 5: "Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable."

These Project Objectives collectively would support the goal of minimizing curtailment of existing renewable power generation during construction of the Proposed Project while seeking to meet RPS goals in a timely manner, both of which NEER strongly supports. However, in the Draft EIR/EIS, the CPUC and BLM identified only three basic Project Objectives, not one of which appears to consider the potential impact of the Proposed Project on operational or soon to be operational generator interconnection projects in the region. While NEER supports the agencies' interests in upgrading the West of Devers 220 kV transmission lines to provide increased deliverability of electricity, including from planned interconnection projects (see p. A-11), NEER requests that these objectives be modified to expressly state that the Proposed Project is intended to avoid, or minimize as much as possible, possible service interruptions from active or soon to be active generator interconnection projects in the region, including but not limited to NEER-owned facilities.

II. Effects on Utilities and Public Services

On p. D.17-31, Impact UPS-2 is discussed ("Construction would disrupt the existing utility systems or cause a collocation accident"). Specifically, there is mention of the "potential for service interruptions of [] utilities," but there is scant mention in the Draft EIR/EIS regarding the possible impacts on existing generation facilities. In fact, the Draft EIR/EIS wholly fails to provide any technical data – let alone analysis – of the potential impacts of the Proposed project on existing generation facilities. Moreover, this section identifies one mitigation measure – UPS-2a ("Protect pipeline and overhead and underground utilities") – but the measure includes no mention of specifically protecting generation from existing facilities, and while "coordination with all pipeline and utility owners" is discussed, there is no mention of coordination with owners and operators of existing generation facilities. Moreover, the measure itself is deficient in that it includes no performance criteria or other benchmarks to evaluate the effectiveness of any "protective measures... to be implemented to protected affected facilities."

Because of these deficiencies, NEER requests that the CPUC and BLM undertake studies to detail how the Proposed Project might impact generation from existing facilities in the region, that these studies be discussed in the Draft EIR/EIS, and that appropriate mitigation measures be identified, as appropriate, to address all potentially significant impacts.

III. Alternatives

As summarized above, NEER is concerned about the Proposed Project's construction schedule on the deliverability of generator interconnection projects. As summarized in the Draft EIR/EIS, CEQA requires analysis of alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." (CEQA Guidelines, Section 15126.6(a).) However, by eliminating any Project Objective focused on avoiding or minimizing interruptions to deliverability from interconnection projects, the discussion of possible alternatives to the Proposed Project fails to discuss in detail alternatives that would avoid or minimize such impacts. Furthermore, it is not clear how the timing of the Proposed Project and of the contemplated alternatives would affect progress towards achieving the State's renewable policy goals. There is, for example, no comparative discussion of the alternatives relating to contemplated online dates and the construction timelines, duration, and/or the overall transfer capability of the line for renewable interconnection.

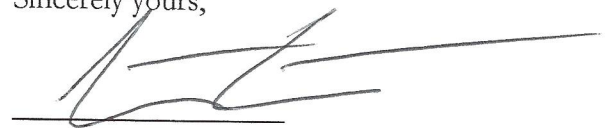
Consistent with the comments above, we request that the discussion of Alternatives be re-evaluated in the context of a new or revised Project Objective expressly focusing on avoiding or minimizing interruptions to or curtailment of interconnection projects.

Finally, as a general housekeeping measure, please add the following name to the notification list for the Proposed Project in addition to the currently-listed contacts for NEER:

Scott Castro
Senior Attorney
NextEra Energy Resources, LLC
1 Post Street
San Francisco, California 94104
Scott.Castro@NextEraEnergy.com

Thank you for the opportunity to comment on the Draft EIR/EIS. We are hopeful that NEER's concerns will be addressed in additional CEQA and NEPA analyses for the Proposed Project.

Sincerely yours,



Scott N. Castro
NEXTERA ENERGY
RESOURCES, LLC