

Southern California Edison
A.23-03-005 – Cal City PTC

DATA REQUEST SET P u b A d v - S C E - 0 0 1

To: Public Advocates Office
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Response Date: 4/18/2023

Question 01:

This project — and the load forecasts used to justify it — were not routed through California’s statewide transmission planning and load forecasting process. Unlike 115 kilovolt (kV) facilities in the service areas of the other two investor-owned utilities (IOUs), it was not verified to be needed by the California Independent System Operator’s (CAISO) Transmission Planning Process (TPP).¹

Similarly, in discussing the load growth that justifies the instant project in the application, SCE did not reference the California Energy Commission’s (CEC’s) Integrated Energy Policy Report (IEPR) Electricity Forecast, which is used in statewide transmission reliability planning.²

This makes it difficult for the Public Advocates Office (Cal Advocates) or the California Public Utilities Commission (CPUC) to independently verify or corroborate the significant load growth figures provided in the instant application. According to instant application, load growth in the California City Electrical Needs Area (ENA) is projected to grow about 61 times faster than SCE’s service area as a whole (see Table 1).

Table 1 - Comparison of Load Growth in California City ENA versus SCE Service Area, 2022-2030

Current Load that can be served by Cal City Substation, per SCE Application 23-03-005 (MVA)³	Projected Load in the Electrical Needs Area by 2030, per SCE Application 23-03-005 (MVA)	Percent Change
18	173	861%
Historic Net Peak in SCE’s Planning Area, 2022, per CEC IEPR (MW)⁴	Projected Net Peak in SCE’s Planning Area, 2030, 1 in 10 Historic Temperature Peak, per CEC IEPR (MW)	Percent Change
23,597	26,868	14%

So that Cal Advocates can corroborate the load growth that justifies this \$296 million project, please provide copies of the interconnection requests from customers to SCE that constitute, in the aggregate, the projected 155 MVA growth in load between now and 2030. SCE can, if necessary, redact the names or identifying information of the customers in question, but should leave the estimated load size intact.

¹ SCE has stated that certain 115 kV facilities are not controlled or operated by the CAISO and are as such not included in the CAISO’s planning processes. (Appendix A – Queue Cluster 13 Phase II

Report. SCE. P. 10. Available at https://www.sce.com/sites/default/files/custom-files/WDT1706_Appendix_A_QC13_Phase_II_Study_Report.pdf.)

² The CAISO's Transmission Planning Process integrates the CEC's IEPR Electricity Forecasts for uses in transmission planning. (2021-22 Transmission Plan. CAISO. March 17, 2022. P.3.

Available at <http://www.caiso.com/Documents/ISOBoardApproved-2021-2022TransmissionPlan.pdf>.)

³ Application of Southern California Edison Company for a Permit to Construct Electric Facilities with Voltages Between 50 kV and 200 kV: Cal City Substation 115 kV Upgrade Project. P. 2. A. 23-03-005. Available at

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M503/K589/503589303.PDF>.

⁴ CEC IEPR CEDU 2022 Baseline Forecast – SCE. Form 1.5. Available at

https://docketsearch.energy.ca.gov/Pages/results.aspx?k=*%&a=IsDocument%3a1+DocketNumber%3a22-IEPR-03&docketnumber=22-IEPR-03.

⁵ Application of Southern California Edison Company for a Permit to Construct Electric Facilities with Voltages Between 50 kV and 200 kV: Cal City Substation 115 kV Upgrade Project. P. 9. A. 23-03-005. Available at

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M503/K589/503589303.PDF>.

⁶ See Application of Southern California Edison Company for a Permit to Construct Electric Facilities with Voltages Between 50 kV and 200 kV: Cal City Substation 115 kV Upgrade Project. P. 9. A. 23-03-005 at PDF p. 111.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M503/K589/503589303.PDF>.

Response to Question 01:

SCE's application for the Cal City Substation 115 kV Upgrade Project ("Cal City Project") was filed as a Permit to Construct ("PTC"). Pursuant to California Public Utilities Commission General Order 131-D, Section IX.B.1.f., "an application for a permit to construct *need not include either a detailed analysis of purpose or necessity*... beyond that required for CEQA compliance." (emphasis added)

Further, as noted in the Commission's Decision 94-06-014, which adopted General Order 131-D: "The process we adopt for lines between 50 and 200 kV differs from the review that results in the issuance of a [CPCN] for lines over 200 kV. The process will result in a 'permit to construct' and *our review will focus solely on environmental concerns*, unlike the CPCN process which considers the need for and the economic cost of a proposed facility."

"Because the [PTC] review focuses solely on environmental issues, the Commission, on the advice of Commission staff, shall issue or deny a permit as soon as it may legally do so following completion of the requisite CEQA review."

"[The Energy Division of the CPUC] in conjunction with other parties developed a [PTC] procedure for power lines designed to operate between 50 and 200 kV. *The [PTC] review is meant strictly for environmental review, not economic or 'needs' review.*" (D. 94-06-014, at 2-3, 22, emphasis added.)

To that end, SCE specifically objects to this request under Rule 10.1 of the Commissioner's Rules of Practice and Procedure on the grounds that the load growth information sought is not relevant to

the subject matter involved in the pending proceeding. As explained in D. 94-06-014, the Commission's review in a PTC proceeding specifically excludes a review of project need, and therefore evidence regarding SCE's load growth projections is not likely to be admissible in this proceeding. Nor does this data request provide any basis for the conclusion that the evidence requested would be admissible in this PTC proceeding. Consequently, SCE is under no particular obligation or requirement to respond to any data requests pertaining to an application for a PTC that are intended to address project purpose, need or cost analysis, including this data request which is focused entirely on information related to project need.

Nevertheless, in recognition of the authorities related to the rights and obligations of the Public Advocates Office (including those stated in Public Utilities Code sections 309.5, 314 and 583), and without waiving any objection, SCE provides the following response:

The Cal City Substation 115 kV Upgrade Project is not subject to California Independent System Operator's (CAISO) Transmission Planning Process (TPP). SCE's 115 kV facilities are operated as radialized "local distribution facilities" as determined by the Federal Energy Regulatory Commission (FERC) Order 773² (except for a portion of the Victor-Kramer 115 kV system). SCE's radialized 115 kV facilities do not operate electrically in parallel (networked with the CAISO-controlled transmission facilities), and as a result are not subject to CAISO control nor fall under the purview of the annual CAISO TPP. SCE's 115 kV facilities therefore differ from those in the service areas of California's other two investor-owned utilities (IOUs), which are operated electrically in parallel (networked) with CAISO-controlled transmission facilities and are therefore subject to CAISO control and the annual CAISO TPP.

The Cal City Project does not require CAISO approval. CAISO approval is only necessary for facilities that are either (i) under its jurisdiction based on being 100 kV or higher (and not excluded as determined by FERC Order 773), or (ii) are methods-of-service that connect directly to the transmission grid under CAISO jurisdiction. While the CAISO is responsible for validating load values provided by SCE at transmission system load buses (as part of the annual CAISO TPP) against the California Energy Commission's (CEC) Integrated Energy Policy (IEPR) forecast, it does not review or approve SCE's local-area load growth.

SCE's local planning office for the Cal City area has received over 90 requests to provide service to customers in the City of California City, totaling approximately 220 megavolt amperes (MVA). Service requests are initiated when a customer submits the required data to the local SCE planning office. SCE uses this customer-submitted information to calculate the load required to serve each project. To date, SCE has received requests for 94 projects, with a commercial service totaling approximately 220 MVA. Customers typically request to have power made available to their site within a year of their submittal to SCE. Due to the number of requests, load size, and current system

² See Revisions to Electric Reliability Organization Definition of Bulk Electric System, Order No. 773, 141 FERC ¶ 61,236 (2012). Section 6. Exclusion E1 (Radial Systems) specifically excludes radial facilities over 100 kV from the bulk electric system (BES). – "Exclusion E1 provides as follows: Radial systems: A group of contiguous transmission Elements that emanates from a single point of connection of 100 kV or higher"... (p. 77)

capacity many of these customers have been waiting several years to receive electrical service.

Please see the attached spreadsheet titled "A.2303005 PubAdv-SCE-001-Q1.xlsx" summarizing current customer applications SCE has received, with customer-requested load amounts expressed in MVA. All projects included in the list are located within California City. Projects with the same customer number indicate a single developer with multiple projects at separate sites.

Cal City Substation 115 kV Upgrade Project**A.2303005-PubAdv-SCE-001-Q1**

Customer #	Project #	Location	Total Projected Load (MVA)
CC-003	1	California City	0.266
CC-003	2	California City	0.266
CC-101	3	California City	0.188
CC-101	4	California City	0.188
CC-101	5	California City	0.313
CC-101	6	California City	0.313
CC-101	7	California City	0.231
CC-101	8	California City	0.288
CC-101	9	California City	0.288
CC-101	10	California City	0.288
CC-101	11	California City	0.532
CC-101	12	California City	0.532
CC-101	13	California City	0.532
CC-101	14	California City	0.532
CC-101	15	California City	0.532
CC-101	16	California City	0.532
CC-101	17	California City	0.532
CC-101	18	California City	0.532
CC-101	19	California City	0.532
CC-101	20	California City	0.532
CC-101	21	California City	0.532
CC-101	22	California City	0.532
CC-101	23	California City	0.532
CC-101	24	California City	0.532
CC-101	25	California City	0.532
CC-101	26	California City	0.532
CC-101	27	California City	0.532
CC-101	28	California City	0.532
CC-101	29	California City	0.532
CC-101	30	California City	0.532
CC-101	31	California City	0.532
CC-101	32	California City	0.532
CC-101	33	California City	1.330
CC-101	34	California City	0.532
CC-101	35	California City	0.532
CC-101	36	California City	0.532
CC-101	37	California City	0.532
CC-101	38	California City	0.532
CC-101	39	California City	0.532
CC-101	40	California City	0.532
CC-101	41	California City	0.040
CC-104	42	California City	0.813
CC-104	43	California City	0.813

CC-106	44	California City	1.000
CC-110	45	California City	0.133
CC-110	46	California City	0.532
CC-110	47	California City	0.798
CC-113	48	California City	12.000
CC-113	49	California City	12.000
CC-113	50	California City	12.000
CC-113	51	California City	9.000
CC-113	52	California City	9.000
CC-113	53	California City	9.000
CC-113	54	California City	9.000
CC-113	55	California City	9.000
CC-113	56	California City	9.000
CC-113	57	California City	6.000
CC-115	58	California City	1.500
CC-115	59	California City	1.500
CC-116	60	California City	6.385
CC-116	61	California City	6.385
CC-116	62	California City	6.385
CC-116	63	California City	6.385
CC-118	64	California City	1.500
CC-119	65	California City	2.660
CC-119	66	California City	2.660
CC-119	67	California City	2.660
CC-124	68	California City	3.991
CC-125	69	California City	0.000
CC-128	70	California City	1.064
CC-129	71	California City	1.064
CC-130	72	California City	0.228
CC-201	73	California City	1.500
CC-202	74	California City	0.998
CC-202	75	California City	0.998
CC-202	76	California City	0.998
CC-202	77	California City	0.998
CC-202	78	California City	0.998
CC-203	79	California City	0.000
CC-204	80	California City	0.300
CC-205	81	California City	0.798
CC-206	82	California City	0.000
CC-207	83	California City	0.231
CC-208	84	California City	1.995
CC-209	85	California City	1.663
CC-210	86	California City	1.330
CC-212	87	California City	37.246
CC-213	88	California City	0.033
CC-215	89	California City	1.663
CC-216	90	California City	2.660

CC-217	91	California City	1.064
CC-219	92	California City	0.532
CC-220	93	California City	0.000
CC-221	94	California City	0.798
Total			220.686