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

DATA REQUEST SET E D - S C E - J D R I - C P r o j e c t - 0 0 1

To: Energy Division
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Received Date: 11/19/2024

Response Date: 2/7/2025

Question JDR-01. Follow up:
JDR-1: Sharing I-C Structures

Please comment on a potential alternative in which along US 395, the Cal City 115 kV conductors would be installed in the vacant position on the I-C double circuit structures (rather than on newly constructed Cal City structures).

If the shared structure concept is deemed feasible, please also comment on the feasibility of additionally transferring approximately 2 miles of the Isner 33 kV distribution circuit, possibly as a distribution under-build arrangement, onto the I-C structures as is similarly proposed for the Cal City Project. Ignoring the potential timing concerns, can SCE develop a physical alternative or approach that will serve the needs of both projects?

Response to Question JDR-01. Follow up:

SCE is supplementing JDR-01 to provide information regarding newly identified facilities SCE became aware of after SCE submitted its prior response to this question on December 13, 2024. This response provides SCE's further analysis of the proposed potential alternative based on the consideration of these newly identified facilities, supplementing SCE's prior responses (including the responses to Question JDR-2 and JDR-3).

SCE has identified other installed electrical and telecommunication facilities located on the wood poles supporting the Isner 33 kV distribution line adjacent to Highway 395 heading north from Kramer Substation for about three miles. These facilities may need to be considered when performing the final designs for both the Cal City and Ivanpah-Control (I-C) projects after the CPUC issues its final decisions for each project.

A third-party telecommunications circuit, operated by Frontier Communications (Frontier), is currently underbuilt on the wood poles supporting the Isner 33 kV line for approximately three

miles north of Kramer Substation, until they both turn west along Farmington Road. To provide sufficient space for the existing Frontier telecommunication circuit to be collocated on the new shared 115 kV structures, the poles would need to be 10-15 feet taller than SCE indicated in its December 13, 2024, responses. When taken together, the potential relocation of both the distribution and telecommunication circuits could result in the proposed structures having their approximate heights above ground increased by approximately 20-30 feet as compared to the heights described in either Table 3-3 of the Cal City Proponent's Environmental Assessment (PEA) and Table 3.5-1 of the I-C PEA.

Collocating Frontier's telecommunication circuit to the new I-C Structures would require the CPUC to both (1) direct SCE to make necessary provisions for collocation and (2) issue a separate order directly to Frontier requiring them to move their circuitry to SCE's new structures. If that occurs, SCE would relocate the Isner 33 kV circuit to the new poles, cut the existing wood poles to a level just above the telecommunications circuit, and transfer ownership of the poles to Frontier pursuant to Joint Pole Agreement requirements. The time it would take for Frontier to transfer their circuitry to the new 115 kV structures and remove the lower portions of the existing wood poles is unknown. The construction delay and impacts associated with any work that would be performed by Frontier has not been quantified in either the Cal City or I-C PEA.

In addition to the telecommunication circuit, there is also an existing 115 kV circuit serving a solar generation plant north of Kramer Substation that parallels the proposed routing of the new Cal City 115 kV line. For approximately 0.4 miles north of the Highway 58 offramp area, the Isner 33 kV line is currently underbuilt on those existing structures, so relocating that distribution circuit to either the future Cal City and/or I-C structures may not result in the optimal design in this specific area because the poles currently supporting the gen-tie line would remain regardless of whether the Cal City and IC circuits are collocated.

In conclusion, similar to the December 13, 2024, response, SCE agrees that it may be feasible to collocate the Cal City and I-C 115 kV circuits on shared structures for approximately 15 miles north of the existing solar generation facility, including an approximately 1.5-mile-long section where the Isner 33 kV circuit would be underbuilt on those shared structures. If collocation were to occur, SCE recommends that the CPUC and BLM consider an alternative that includes the proposed Cal City Project alignment for the first approximately three miles north of Kramer Substation (e.g., at the location where the Kramer-BLM West 220kV towers join the alignment coming in from the east) and then transitioning to the proposed I-C Project alignment for the remaining approximately 15 miles north of that location. This approach would increase construction efficiency and reduce necessary 115 kV circuit outages to the existing Kramer-Inyokern #1 115 kV circuit when constructing in that length.