

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 19, 2024

Ms. Lori Charpentier
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

Re: Joint Data Request for the SCE Ivanpah-Control (I-C) Project (A.19-07-015) and the Cal City Substation 115 kV Upgrade (Cal City) Project (A.23-03-005)

Dear Ms. Charpentier:

Southern California Edison Company (SCE) submitted its Amended Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on April 13, 2020. SCE submitted a PTC application to the CPUC for the Cal City Substation 115 kV Upgrade Project on March 14, 2023. This Joint Data Request (JDR) defines additional information required for completion of the separate Draft EIRs that are being prepared for the two projects.

The I-C Project requires the construction of a new 115 kV line, in which conductors for only one circuit would be installed on double-circuit structures (leaving a vacant position available). After this line is energized, the existing double-circuit I-C line would be removed. The Cal City Project line proposed to be constructed in this segment would be a single-circuit 115 kV line on an entirely separate set of structures west of both the existing and the future I-C lines.

This data request is driven by concerns about potential direct and cumulative effects of the two projects in the corridor along the west side of US 395 that extends approximately 18.5 miles north of Kramer Junction. In this area, there would be construction-related ground disturbance along three separate but immediately adjacent 115 kV rights-of-way: (1) the new I-C structures would be constructed about 50 feet west of the existing I-C 115 kV structures; (2) the existing I-C structures would be removed; and (3) the Cal City 115 kV line would be constructed about 25 feet west of the new I-C line.

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?

JDR-2: Timing Related to Sharing of I-C Structures

SCE is aware of the BLM NEPA schedules for both projects. Neither the I-C Project nor the Cal City Project can be constructed until receipt of BLM approval.

- (a) If the NEPA process is completed and BLM ROW grants are issued for both projects during 2025, as BLM currently expects, would there be any timing concerns associated with sharing of the I-C structures?
- (b) If required to serve Cal City load, could SCE prioritize construction of I-C Segment 2 over Segment 1?

JDR-3: Loop-in Cal City Project 115 kV Line

- (a) Please comment on the potential alternative in which the Cal City 115 kV line would not be constructed along US 395, but instead would be a single or double-circuit 115 kV line from Cal City Substation that would loop into the I-C 115 kV Inyokern-Kramer-Randsburg circuit. Would this configuration adequately serve the Cal City Project's needs? Please explain whether a single- or double-circuit line would be required in this situation.
- (b) Please comment on the potential use of a tap, ring-bus, or breaker and a half loop-in configuration to be constructed in the area just west of the intersection of US 395 and 20 Mule Team Parkway.
- (c) If a breaker and a half scheme or similar loop-in configuration would not be acceptable, what other options are available to allow the Cal City Project to benefit from the I-C 115 kV line to Kramer Substation, without construction a redundant 18.5 miles of new line?

Response

Please respond to this request within 2 weeks with a proposed approach and provide a copy to both CEQA consultants (I-C Project: Susan Lee at Slee@aspeneg.com and Cal City Project: Matt Fagundes, MFagundes@esassoc.com). Additional data requests may be necessary to address other issues as we move forward with EIR preparation. Any questions on this data request should be directed to John Forsythe (john.forsythe@cpuc.ca.gov) or Boris Sanchez (Boris.Sanchez@cpuc.ca.gov).

Sincerely,



John E. Forsythe
Project Manager for the I-C Project



Boris Sanchez
Project Manager for the Cal City Project

cc: David LeBlond, Southern California Edison (David.leblond@sce.com)
Michelle Wilson, Supervisor CEQA & Energy Permitting Group, CPUC (michelle.wilson@cpuc.ca.gov)
Joan Patrovsky, Project Manager, BLM (jpatrovs@blm.gov)
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