

*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**  
**Prepared by: Paul McCabe**  
**Job Title: Senior Advisor**  
**Received Date: 11/19/2024**

**Response Date: 12/13/2024**

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**Question JDR-1:**

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-1:**

SCE believes that it may be feasible to install a segment of SCE's proposed new Kramer-Cal City 115 kV line (part of the proposed Cal City Substation 115kV Upgrade Project) on shared structures that would be installed as part of SCE's proposed Ivanpah-Control Project.

The proposed new Ivanpah-Control Project double-circuit 115 kV line structures could be designed to accommodate the under-build of approximately two miles of SCE's existing Isner 33 kV circuit. However, designing the Ivanpah-Control Project double-circuit 115 kV line structures to accommodate the underbuild of the Isner 33 kV distribution circuit could result in structure heights that may exceed the pole height range identified in SCE's Ivanpah-Control Project and Cal City Substation 115 kV Upgrade Project Proponent's Environmental Assessment. Additionally, SCE does have concerns about the impact of the proposed approach on the timing for reviews, project approvals, coordination, and construction activities, particularly given that it would likely require the completion of Segment 2 of the Ivanpah-Control Project prior to the beginning of construction of the contemplated 18.5-mile portion of the Cal City Substation 115 kV Upgrade Project, which would include the Isner 33 kV distribution circuit underbuild.

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**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**  
**Prepared by: David De Leon**  
**Job Title: Major Construction Project Manager**  
**Received Date: 11/19/2024**

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**Question JDR-2a:**

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?

**Response to Question JDR-2a:**

2a) SCE is aware of the BLM NEPA schedules for both projects and understands that each project requires BLM approval prior to proceeding. If the BLM completes the NEPA process and issues ROW grants for both projects in 2025, there would be potential additional timing concerns associated with sharing the I-C structures. For example, additional resource agency permits may be necessary for each project, including waters and take permits from CDFW. If there are delays to permitting approval for the I-C Project, the Cal City Substation 115kV Upgrade Project would unnecessarily be delayed.

Although there are concerns about the timing for reviews, project approvals, coordination, and construction activities, SCE believes if a) both agencies are aligned and pursuing the common objective reflecting this work in the area, and b) SCE receives approvals from both regulators (e.g., CPUC and BLM) for both projects in a fairly synchronized timeframe, then both projects can coordinate and modify the engineering design, address procurement needs, and adjust construction scheduling efforts to meet an objective of sharing structures.

*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**  
**Prepared by: Scott Lacy**  
**Job Title: Major Construction Senior Project Manager**  
**Received Date: 11/19/2024**

**Response Date: 12/13/2024**

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**Question JDR-2b:**

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.

b. If required to serve Cal City load, could SCE prioritize construction of I-C Segment 2 over Segment 1?

**Response to Question JDR-2b:**

At this time the overall construction sequencing of the Ivanpah-Control project has not been developed. However, because of the stand-alone utility of each Ivanpah-Control project segment, it is feasible that the scheduling for construction of Ivanpah-Control Segment 2, or at least that approximately 18-mile long portion where that segment overlaps with the Cal City project scope, could be aligned with the timing needed to serve Cal City load.

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

**DATA REQUEST SET E D - S C E - J D R Cal City Project - 001**

**To: Energy Division**  
**Prepared by: Paul McCabe**  
**Job Title: Senior Advisor**  
**Received Date: 11/19/2024**

**Response Date: 12/13/2024**

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**Question JDR-3:**

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 to Question JDR-3:**

**Part a.**

SCE does not support the proposed potential alternative, because it would bring all of SCE's Kramer 115 kV System under California Independent System Operator ("CAISO") control and has the potential to require significant additional system upgrades, either of which could have wide-ranging impacts in terms of cost, project timing, and environmental impacts.

SCE is unable to confirm or refute whether the proposed Cal City Substation 115 kV Upgrade Project would be adequately served by looping the Cal City Substation 115 kV source lines into the Ivanpah-Control Project's Inyokern-Kramer-Randsburg No. 1 115 kV circuit as neither SCE nor CAISO have performed any planning studies addressing this proposal. However, either a tapped or looped, single or double-circuit option would require installation of a switching station, as described in greater detail in SCE's response to Part b. of this question, below.

The portion of SCE's Kramer 115 kV System that would serve Cal City Substation is a radial distribution network served from the California Independent System Operator ("CAISO")-controlled Bulk Electric System ("BES") and is not under CAISO control and, therefore, not subject

to be compliant with North American Electric Reliability Corporation (NERC) reliability standards, Western Electricity Coordinating Council (WECC) regional criteria, and the CAISO planning standards. If the Kramer radial portion, including the Cal City 115 kV Substation, becomes part of the network BES, then it has to comply with the aforementioned standards which could result in additional system upgrades which would significantly increase the scope, cost and environmental impacts.

Configuring one of the Cal City Substation's 115 kV source lines to tap or loop into the CAISO-controlled Kramer-Inyokern-Randsburg No. 1 115 kV Line would require CAISO approval and would then subject all of SCE's Kramer 115 kV System to CAISO control. This would require submitting the proposal through the CAISO Transmission Planning Process (TPP), obtaining CAISO approval, and if approved, subjecting all of SCE's existing non-CAISO-controlled Kramer 115 kV System facilities to CAISO planning criteria.

Connecting to the CAISO-controlled Kramer-Inyokern-Randsburg No. 1 115 kV Line may require significant additional system upgrades, as determined through the CAISO TPP. These potential upgrades would require considerable time to plan, obtain necessary approvals, and construct. It is reasonable to expect that this work could cause substantial additional environmental impacts, additional delays, and significant cost increases compared to SCE's proposed design for the Cal City Substation 115 kV Upgrade Project.

**Part b.**

Connecting to the Cal City Substation 115 kV Upgrade Project's 115 kV source lines into the CAISO-controlled Kramer-Inyokern-Randsburg No.1 115 kV Line (Segment 2 of SCE's Ivanpah-Control Project) would require installation of a new 115/115 kV switching substation. This switching station, at a minimum, would necessitate pole-line structures to route the lines in and out, switchrack structures to terminate the lines, circuit breakers, and a control building. Constructing a new switching station would not only significantly increase costs but potentially increase environmental impacts to the overall scope of the two separate projects.

**Part c.**

SCE has not identified an option that would allow the Cal City Substation 115 kV Upgrade Project to benefit from the Ivanpah-Control Project's Kramer-Inyokern-Randsburg No.1 115 kV Line rebuild that would eliminate the need to install 18.5 miles of new 115 kV line (i.e., connecting Cal City Substation directly to the Kramer-Inyokern-Randsburg No.1 115 kV Line). Any such approach would require the installation of additional upgrades (e.g., switching station) not previously contemplated in either the Cal City Substation 115 kV Upgrade Project or the Ivanpah-Control Project. SCE does not believe that any feasible alternative exists that would meet the needs of the Cal City Substation 115 kV Upgrade Project without the construction of a new 115 kV line that directly connects Kramer Substation and the proposed Cal City Substation. As stated in SCE's response to Question JDR-1 in this Data Set, installing a second 115 kV circuit on the proposed double-circuit structures that are planned to be installed in Segment 2 of the Ivanpah-Control Project would eliminate approximately 18.5 miles of new 115 kV pole line construction and the associated costs and environmental impacts. This alternative would result in the same electrical 115 kV source line configuration (i.e., would include a two-terminal Kramer to Cal City 115 kV line) as SCE's currently proposed Cal City Substation 115 kV Upgrade Project. While SCE would be agreeable to further consider this potential option, there are concerns that need to be overcome. Of

particular concern is that the timing of the Cal City Substation 115 kV Upgrade Project would become dependent on the Ivanpah-Control Project and would require that the construction activities between the two projects be coordinated.