

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) For a Permit to Construct Electrical Facilities with Voltages Between 50 kV and 200 kV: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project.

A.15-12-007

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
RESPONSE TO ADMINISTRATIVE LAW JUDGE'S RULING ADOPTING INTERIM
SCHEDULE AND DIRECTING FURTHER ACTIVITIES AND UPDATES**

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I.

INTRODUCTION

Southern California Edison Company (SCE) respectfully submits the following information related to the Circle City 66/12 kV Substation and Mira Loma-Jefferson 66 kV Line Project (Circle City Project) in response to Administrative Law Judge's Ruling Adopting Interim Schedule and Directing Further Activities and Updates, dated November 21, 2019. ("November 21st Ruling").¹

For background, on May 4, 2016, the California Public Utilities Commission (CPUC) assigned Commissioner issued a Scoping Memo and Ruling which set the scope of issues, procedural schedule, and category of the proceeding and determined that hearings were unnecessary. That procedural schedule was subsequently updated to reflect delays in the

¹ The November 21st Ruling is available using the following link: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M319/K837/319837344.PDF>, last checked Dec. 2, 2019.

environmental review process.² The Final Environmental Impact Report (Final EIR) was released in December of 2018, and a prehearing conference (PHC) was held thereafter, on February 8, 2019 at the Corona City Hall.

On May 10, 2019, SCE requested a temporary suspension of the proceeding to reanalyze some of its underlying data and to prepare and present relevant new updated information to the CPUC with the potential to alter the scope of the remaining Permit to Construct (PTC) proceeding. Specifically, SCE was in the process of considering updated forecast information suggesting that the substation need originally proposed as part of SCE's proposed Circle City Project was no longer required within SCE's ten-year planning window and was being deferred until approximately 2032. Additionally, while SCE's ongoing analyses suggested that the need for the proposed Mira Loma-Jefferson 66 kV Subtransmission Line (MLJ Line) continued to be present, additional analysis was warranted to confirm the magnitude and timing of that need; as well as to allow proper consideration of any related project alternatives to satisfy that need.

In response to SCE's request, on June 5, 2019, the assigned Administrative Law Judge (ALJ) issued a ruling (June 5th Ruling) vacating the proceeding schedule previously adopted in the proceeding and directed SCE to conduct and complete its updated forecast analysis and related need analysis for the proposed Circle City Substation and the proposed MLJ Line, as well as the battery alternatives analysis in the Final EIR, and to file its updated analysis, findings and conclusions as a compliance filing by September 5, 2019.

On September 5, 2019, SCE filed its updated analysis, findings and conclusions from its efforts undertaken in compliance with the June 5th Ruling (SCE's Update).³ As provided in SCE's Update, SCE conducted and completed its updated load forecast analysis for the proposed Circle City Substation and concluded that the proposed Circle City Substation is no longer needed within SCE's ten-year planning horizon. Accordingly, SCE is no longer pursuing the

² See Second Amended Scoping Memo and Ruling dated April 13, 2018.

³ SCE's Update is available using the following link:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M317/K533/317533539.PDF>

Circle City Substation project element in this proceeding. As also provided in SCE's Update, SCE completed an initial updated load forecast analysis for the proposed MLJ Line, however, the receipt of new load-increase requests from the City of Corona (City) required SCE to update its forecast for both project need and scope.⁴

As a result, SCE requested that the proceeding schedule remain suspended until the additional new studies for serving the City's Wholesale Distribution Access Tariff (WDAT) load requests could be completed and the results incorporated into SCE's analyses of the need for the MLJ Line. Prior to receiving the City's WDAT requests, SCE had reviewed alternatives to the proposed MLJ Line, including different Battery Energy Storage Solutions (BESS) as well as consideration of a new reconductoring option that could satisfy the MLJ Line need.⁵ As reflected in SCE's Update, while the proposed new MLJ Line would still meet the identified system need, SCE also evaluated the following:

- Battery Energy Storage System (BESS)
 - BESS 1 – 12 kV connection at the former Circle City Substation site
 - BESS 2 – 12 kV connection at two other locations
 - BESS 3 – 66 kV connection at a single other location
- Reconductoring
 - Reconductor approximately 2.7 miles of the existing Mira Loma-Corona-Jefferson 66 kV Line using non-standard Aluminum Composite Core Conductor (ACCC)

⁴ Specifically, the City of Corona executed two study agreements with SCE under the WDAT to evaluate methods of service to serve additional load had planned to add to two of its existing WDAT interconnections. These requests were provided to SCE after the majority of its planning activities were completed for the current 10-year planning cycle and studies regarding these requests were performed by SCE pursuant to the tariff.

⁵ This analysis studied DERs (three battery storage alternatives) as alternatives to the previously proposed MLJ Line. While SCE determined that the battery alternatives were feasible to meet the electrical need, it was determined that the ACCC alternative would be more cost effective and have less environmental impact than the battery alternatives. Therefore, DERs were evaluated and found not to be a superior alternative to the ACCC reconductoring alternative.

In response to SCE's unopposed request that the proceeding schedule remain suspended, the November 21st Ruling requires SCE to "complete its analysis and studies for the City of Corona, Mira Loma–Jefferson 66 kilovolt subtransmission line need date and related project alternatives and shall prepare and serve on the service list an updated analysis, resulting studies and proposed schedule for moving forward with this proceeding, and file the same with the docket office as a compliance filing."⁶

As provided in this response, SCE has completed the necessary analysis and studies for the City and has reviewed the MLJ Line need date and related project alternatives. Based on the results of the WDAT studies for the City of Corona, one request was withdrawn by the City and the other was reduced to a level that could be accommodated by the existing system capacity. Regarding the 2019-2028 ten-year electrical needs area forecast, the conclusions and alternatives presented in SCE's September 5th filing are still valid. Accordingly, SCE recommends ACCC reconductoring as it is the most economical and least environmentally impactful solution for the ten-year planning horizon. This solution would require reconductoring only 2.7 miles of an existing line segment, as opposed to the construction of a new 10.9 mile single-circuit 66 kV subtransmission line, or the BESS alternatives. Moreover, reconductoring would be exempt from licensing under G.O. 131-D (exemption b) because it is a "like-for-like" replacement on an existing line.

Given that SCE is no longer pursuing either of the proposed project elements within this proceeding, SCE would support the CPUC dismissing the PTC Application based on the fact the ACCC reconductoring is exempt work and closing the proceeding. Given that SCE is no longer pursuing either of the proposed project elements within this proceeding, SCE would support the CPUC closing the proceeding.

⁶ November 21st Ruling at p.5.

II.

CIRCLE CITY SUBSTATION NEED ANALYSIS

As described in SCE's September 5, 2019 filing, and as acknowledged in the November 21st Ruling, the need date associated with the Circle City Substation element of the A.15-12-007 proceeding is beyond the 2019-2028 planning horizon (as well as the preliminary 2020-2029 horizon) and as such, SCE is no longer pursuing approval for the proposed Circle City Substation as part of this proceeding.

III.

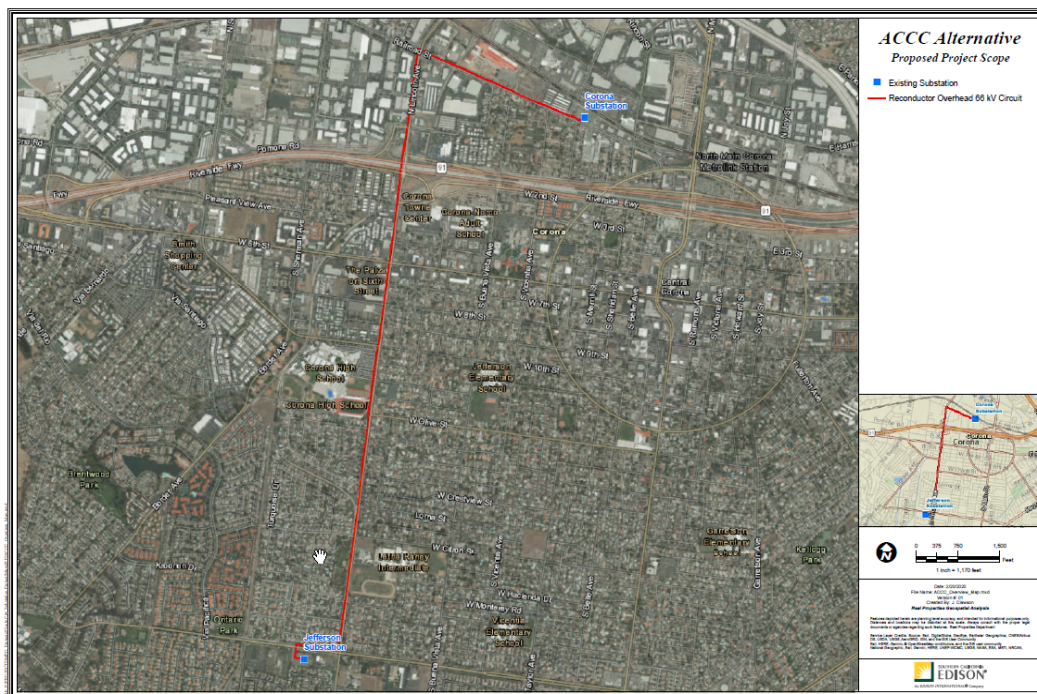
MIRA LOMA-JEFFERSON LINE NEED ANALYSIS

As described in SCE's September 5, 2019 filing, and as acknowledged in the November 21st Ruling, the need date associated with the MLJ Line element of the A.15-12-007 proceeding remains within the 2019-2028 planning horizon, and as such, SCE continues to pursue a solution to address this system need. However, SCE proposes that the most effective and efficient means to address this system need is through reconductoring the existing line, which would be exempt from G.O. 131-D. Thus, SCE is no longer pursuing approval for the proposed MLJ Line as part of this proceeding.

Figure 1 below illustrates the scope for the ACCC Reconductoring Alternative, which would include reconductoring approximately 2.7 miles of overhead conductor on the Jefferson segment of the existing Mira Loma-Corona-Jefferson 66 kV Line which is projected to be overloaded under N-1 conditions by 2023. Figure 1 below illustrates the ACCC reconductoring scope, which would include reconductoring approximately 2.7 miles of overhead conductor on the Jefferson segment of the existing Mira Loma-Corona-Jefferson 66 kV Line which is projected to be overloaded under N-1 conditions by 2023. The use of this alternative conductor type had not previously been considered for use in assessing the overload on the Mira Loma-Corona-Jefferson 66 kV Line as it was not an approved standard conductor. However, SCE has recently begun to use this type of conductor in certain applications specifically to address line

clearance issues and is now also assessing its use in circumstances to address overload conditions. SCE performed an initial review of the existing pole line and expects that only a small number of like-for-like poles would need to be replaced. Additionally, there is no telecom scope required for reconductoring.

Figure 1 – ACCC Reconductoring Overview Map



IV.

PROPOSED SCHEDULE FOR MOVING FORWARD WITH THIS PROCEEDING

Based on SCE's position that the preferred path for moving forward is to close this proceeding and because the ACCC reconductoring would be exempt under G.O. 131-D, SCE is not proposing a schedule for moving forward with A.15-12-007.

V.

CONCLUSION

As described in this filing, the need for the Circle City Substation no longer exists within the ten-year planning horizon. In addition, SCE has determined that while there is still a need for the MLJ Line, that need can be met by reconductoring the existing line, which would otherwise be exempt from licensing under G.O. 131-D. Accordingly, SCE would support the closure of the Circle City proceeding and of A.15-12-007.

Respectfully submitted,

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