STATE OF CALIFORNIA EDMUND G. BROWN, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 8, 2014 VIA MAIL AND EMAIL

Christine McLeod Principal Advisor - Regulatory Affairs Dept. Southern California Edison 8631 Rush Street, General Office 4 - G10Q (Ground Floor) Rosemead, CA 91770

SUBJECT: Data Request #3 for the Southern California Edison Moorpark-Newbury 66 kV Subtransmission Line Project

Dear Ms. McLeod:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review for Southern California Edison (SCE)'s Moorpark-Newbury 66 kV Subtransmission Line Project (Proposed Project), we have identified additional information required in order to adequately conduct the CEQA review. Please provide the information requested below (Data Request #3) by October 22, 2014. Please submit your response in hardcopy and electronic format to me and also directly to our environmental consultant, Environmental Science Associates (ESA), at the physical and e-mail addresses noted below. If you have any questions please direct them to me as soon as possible.

Sincerely,

Michael Rosauer CPUC CEQA Project Manager Energy Division 505 Van Ness Avenue, 4th Floor San Francisco, CA 94102 Michael.rosauer@cpuc.ca.gov ESA Attn: Matthew Fagundes 1425 North McDowell Blvd. Suite 200 Petaluma, CA 94954 mfagundes@esassoc.com

Data Request #3 Moorpark-Newbury 66 kV Subtransmission Line Project

Alternatives

The purpose of the following questions is to provide additional information to assist in the development of alternatives for consideration in the Environmental Impact Report and is not intended for use in analysis of project need.

- 1. Provide updated system power flow diagrams similar to PEA Confidential Attachments B, C, and D for the 2013 transmission plan, updated utilizing 2014 plan data. Perform necessary contingency analysis and note years when, and locations where: voltage and reliability become issues, magnitude of voltage become issues, and line overloads. Assume this system configuration as the Base Case for following analysis.
- 2. Provide update of area substation load forecast similar to PEA Confidential Attachment A.
- 3. Provide results of above power flow (Base Case and contingency cases) analysis with the Proposed Project in service.
- 4. Provide results of above power flow (Base Case and contingency cases) analysis with PEA System Alternative 2 (reconductor option) in service.
- 5. Provide results of above power flow (Base Case and contingency cases) analysis assuming CAMGEN unit is connected to the Moorpark system.
- 6. Provide results of above power flow (Base Case and contingency cases) analysis with PEA System Alternative 2 (reconductor option) project and assuming CAMGEN unit is connected to the Moorpark system.
- 7. This request is directed at determining the feasibility of interconnecting the CAMGEN unit to the Moorpark system and identifying any "fatal flaws" of such a connection rather than conducting a detailed engineering study of any particular proposal.
 - Provide a system single-line diagram indicating how the CAMGEN unit may be interconnected into the Moorpark system. Identify ROW that is available for this connection and where it is not or may not be available. A map or maps of the area clearly identifying the generator site, potential interconnection points, and known ROW restrictions would be helpful. Describe all known issues and currently known potential problems with achieving this interconnection. Provide details as to each of the issues/problems stated. It is understood that the generator is presently connected to the Santa Clara system; describe any impacts (including the severity of each) that would occur to the Santa Clara system if the power generated by the CAMGEN unit were to be transferred to the Moorpark system.
- 8. Discussion of PEA Subtransmission Line Route Alternatives 2 and 3 indicates that each of these alternatives would present technical and reliability impacts and challenges (both present and future). Please provide a full description and discussion of each adverse impact and challenge, as well as potential means to offset the impacts or meet the challenges. Specifically, please provide, but not necessarily limit the discussion to, the following information:

- a. For Subtransmission Line Route Alternative 2, provide more detail about the option identified in protest letters and EIR scoping letters regarding undergrounding the portion of the new 66 kV subtransmission line in the Santa Rosa Valley portion of the Moorpark-Ormond Beach 220 kV ROW; provide detailed explanation of why and where the steep terrain would present engineering challenges for this underground option and what the specific engineering challenges would be and how they could be addressed. The explanation should consider underground perpendicular crossings of the 220 kV line, as well as a placing the line underground longitudinally within the 220 kV ROW in the residential areas of Santa Rosa Valley.
- b. For Subtransmission Line Route Alternative 2, provide additional explanation why the location of the line within the west side of the existing Moorpark-Ormond Beach 220 kV corridor would not be consistent with the Garamendi Principles, i.e., explain why preserving space on the west side of the 220 kV ROW corridor for future use under the Proposed Project would be preferable to preserving space on the east side of the 220 kV ROW corridor under Subtransmission Line Route Alternative 2, assuming the existing poles already constructed on the east side would be removed under this alternative.
- c. For Subtransmission Line Route Alternative 3, provide detail on why the existing double circuit subtransmission lines cannot be collocated on new lightweight steel or tubular steel poles with the proposed new subtransmission line on the north side of State Route 118 within SCE's existing ROW. Please provide a drawing with dimensions of the associated triple-circuit poles that would be required. Please also address the potential of including an additional new subtransmission pole line immediately north of the existing double circuit pole line on the north side of State Route 118, including the possibility of locating the new poles within the existing subtransmission line ROW.
- 9. Regarding Subtransmission line Alternative 2, in SCE response to Proceeding Ludington Data Request 1, Question 8, SCE's cost estimates for the alternative assume replacement of four double-circuit 220 kV towers with taller towers in order to maintain required G.O. 95 clearances as necessitated by the installation of the 66 kV crossings of the 220 kV lines. Please provide drawings (indicating height and width) for each of the poles/towers (220 kV and 66 kV) that would be utilized in each of the crossings in order to maintain the required G.O. clearances. Also note any topographic or other physical features that influence the design. Please also provide an explanation why the proposed subtransmission line poles could not be sized in order to cross under the existing 220 kV poles.