

*Southern California Edison*  
*A.21-08-009 – TLRR CSP PTC*

**DATA REQUEST SET CPUC - SCE - CSPP - 001**

**To: CPUC**  
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**Response Date: 2/8/2024**

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**Question 002:**

For the Highway 6 Route Alternative, as described in the PEA and subsequently modified, provide the following information:

- For Segments 6 and 7, which will need to be double-circuit pole lines based on SCE's response to BLM's data request regarding a Highway 6 alternative, will these lines utilize the same types of structures and components as the double-circuit pole lines proposed for Segment 3 in the Proposed Project? If not, please indicate the differences and/or provide the structure information as provided in Table 3.3-2 for these segments, including the estimated number of poles/structures required for these segments.
- For Segment 4, which will need to be rebuilt into a double-circuit pole line under a Highway 6 Route Alternative per SCE's response to BLM, indicate the types of poles and height range of the existing structures along this segment. Table 3.3-1 in the PEA indicates the existing poles are wood poles ranging from 35 to 47 feet tall, but this is only pertaining to the two poles proposed for removal or modification as part of the Proposed Project. Are the other existing poles within Segment 4 similar?
- The PEA indicates that the Highway 6 Route Alternative would require installation of a new metering station at either the California/Nevada border, the Zack Substation, or near the Fish Lake Valley North Substation. Please indicate the types of facilities that would comprise the metering station, and provide an estimate of the station footprint (acres).
- Could you provide the same economic cost estimates for the SCE version of the Highway 6 Alternative as are provided for the BLM-modified version in SCE's response to the BLM data request? The SCE version of the alternative (as described in the PEA) would require less new double-circuit line construction than the BLM modified version (e.g., nearly all of Segment 3 would be removed and not rebuilt); however, it would require the DER systems at White Mountain and Deep Springs substations, which SCE estimates will cost \$10M and \$12M, respectively. We're wondering how the alternative compares overall in terms of cost.

**Response to Question 002:**

All alternatives that require re-routing of the lines via CA Highway 6 and/or Nevada Highway 264 more than double the linear circuit mileage of the Proposed Project. While SCE's PEA concluded that the Highway 6 alternative was feasible, subsequent more detailed analyses conducted by SCE showed that the additional infrastructure required to construct the alternative would likely result in greater environmental impacts and significantly more cost. Furthermore, the circuitry would not be operable at 55kV due to the extensive additional length of this alternative as compared to the Proposed Project. To effectively operate the extended circuitry, the operating voltage would have to

be increased significantly. As such, increasing the operating voltage would require extensive upgrades, which would significantly increase the environmental impact and cost to all the substations in the area, including Control Substation, Zack Substation, White Mountain Substation, Deep Springs Substation, and the Fish Lake Valley Metering Station. Due to these additional environmental impacts and higher costs, the Highway 6 alternatives (PEA and BLM) were dismissed.

A. This Highway 6 Route Alternative would utilize similar double-circuit pole types as described under Segment 3 of the Proposed Project. However, due to an increase in span length and height of the poles to be used in this alternative, it is assumed that the poles would be taller and therefore have larger diameter in comparison to the proposed project infrastructure.

B. Poles and height ranges for Segment 4 of the PEA and BLM Modified Highway 6 Route Alternative would use the same methodology as Segment 6 and 7 as described above.

C. The new metering facility would be similar to SCE's existing Fish Lake Valley metering station. However, it is assumed that the footprint of the proposed metering station for this alternative would be larger than the existing Fish Lake Valley metering station to accommodate upgraded metering infrastructure.

D. As described in response to Question 2, SCE has determined that the Highway 6 Alternative as described in the PEA is no longer feasible and the updated modified Highway 6 Alternative provided in response to the BLM request is the only viable option of this alternative.

A preliminary analysis of the cost estimate for the Highway 6 alternatives (PEA and BLM) showed that the cost to construct these alternatives was likely to be significantly higher than the Proposed Project. This is due to the significant increase in line length as well as extensive upgrades to all the substations included in these alternatives. For the PEA Hwy 6 alternative, there may be some savings due to not needing to rebuild the portion of segment 3 from the Zack tap to the White Mountain Substation. However, a cursory cost estimate showed that these savings would be insignificant as compared to the additional cost associated with removal of segment 3 as well as the additional significant circuitry and the required substation upgrades at all the substations included in these alternatives.

Furthermore, a preliminary cost analysis did not include additional infrastructure such as Microgrids, battery and solar technology, and other power delivery alternatives for White Mountain and Deep Springs substations. Initial studies and preliminary analysis reveal that the facilities to serve White Mountain and Deep Springs would be prohibitively expensive and not economically feasible. As such, both alternatives were dismissed due to extremely high costs and additional environmental impacts.